

June 14, 2013

BY HAND DELIVERY

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

RECEIVED--FPSC
13 JUN 14 PM 2:24
COMMISSION
CLERK

130165-TA

Re: New Filing - Petition of tw telecom of florida, l.p. for expedited review of growth code denial by the Number Pooling Administrator for the Tampa Central Exchange

Dear Ms. Cole:

Enclosed for filing, please find the original and seven (7) copies of tw telecom of florida, l.p.'s ("TWTC") Petition for Expedited Review of Growth Code Denial for the Tampa Central Exchange. Under separate cover, TWTC has submitted highlighted, confidential versions of Attachments 1 and 3 with a request that they be covered by the "claim" provisions of Rule 25-22.004(5), Florida Administrative Code.

Thank you for your assistance with this filing. As always, please don't hesitate to contact me if you have any questions or concerns.

Sincerely,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

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

DOCUMENT NUMBER-DATE
03321 JUN 14 2
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 Tampa Central Exchange)
_____)

Docket No. 130165-TA

Filed: June 14, 2013

PETITION FOR EXPEDITED REVIEW OF GROWTH CODE DENIAL

tw telecom of florida, l.p. ("TWTC," or "the Company"), pursuant to 47 C.F.R. § 52.15(g)(3)(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" or "NeuStar's") denial of TWTC's request for additional numbering resources in the Tampa Central exchange.

In support of this petition, TWTC states:

PARTIES

1. TWTC is a statewide-certificated provider of local exchange service and long distance service 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. §2.20(d).

JURISDICTION

3. The Commission has jurisdiction over 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. The Commission is likewise authorized to address this request in accordance with Section 364.16(7), Florida Statutes, 47 C.F.R. §52.15(g)(3)(iv), and 47 U.S.C. §151.

BACKGROUND AND REQUEST FOR RELIEF

4. On or about June 13, 2013, TWTC requested additional numbering resources from NeuStar for the Tampa Central exchange. (See Attachment 1 – *Application and TWTC Back-Up Documentation*.) Specifically, in order to meet the needs of one of its customers, TWTC requested a complete thousands-block in the Tampa Central Rate Center for an effective date of July 14, 2013. TWTC made this request in order to serve a large customer, which is in need of 1,000 numbers. TWTC cannot currently meet this request given its inventory of numbers available at this time in the Tampa Central Rate Center, nor will it be able to meet the customer’s reasonable service expectations unless this request is handled in an expeditious manner.

5. TWTC completed its numbering application in accordance with NANPA’s Central Office Code Assignment Guidelines and completed the necessary Months to Exhaust and Utilization Certification Worksheet required by NANPA. At the time of the code request, the Tampa Central Rate Center (“TAMPACEN”) had an MTE of 12.237 and a utilization of 95.494%. In accordance with Commission Order No. PSC-01-1973-PCO-TL, this MTE and utilization rate information for TAMPACEN is included in Attachment 1.

6. On or about June 13, 2013, NeuStar denied TWTC’s request for additional numbering resources on the grounds that TWTC had not met the MTE and/or utilization based criteria. (See Attachment 2 – *Denial Documentation*.) Pursuant to the INC Guidelines, in order

to obtain thousand-block allocations, the carrier must demonstrate that its existing numbering resources for the rate center will exhaust within six (6) months and also have a utilization of 75 percent for the specific rate center. See INC Guidelines Section 4.3 (c) and Appendix 3. These requirements are known as the six (6) months-to-exhaust (“MTE”) and utilization threshold.

7. 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).

8. Although the current MTE and utilization thresholds were adopted to address conservation of numbering resources, strict adherence to these thresholds will, in many cases, preclude the assignment of numbering resources for legitimate needs. It is for this very reason that procedures have been established for pursuing reversal of a NANPA code denial. In the instant case, due to the large numbering requirement of a single customer, TWTC’s current inventory is simply not sufficient to meet the demand. As such TWTC requires additional numbering resources to meet demand regardless of its current utilization.

9. TWTC requests that the Commission reverse NeuStar’s decision to withhold numbering resources from TWTC on the following grounds:

a. In this instance, TWTC is attempting to accommodate a specific customer’s request for a complete block of 1,000 numbers within TAMPACENT that otherwise cannot be accomplished with current existing numbering resources.

b. As a result of NeuStar’s denial of the request for additional numbering resources, TWTC will be unable to provide telecommunications service for its customer.

c. NeuStar's denial of numbering resources to TWTC interferes with TWTC's ability to serve its customers within the State of Florida.

d. NeuStar's denial of numbering resources will prevent the customer from obtaining service from the customer's preferred provider and could delay the customer's ability to expand its presence in the Tampa Bay area.

10. TWTC believes it meets the conditions stated in FCC Order 01-362, as this request addresses "a specific customer request for numbering resources that exceeds ... available inventory," and that the request of TWTC's customer constitutes "a verifiable need for additional numbering resources" outside the specifically enumerated situations that would justify denial of a code.

11. TWTC requests the Commission's review of the attached NANPA decision to withhold numbering resources from TWTC on the grounds that NANPA's decision is not in accordance with the FCC's intent and requirements in allowing telecommunications service providers access to numbering resources to meet specific customer demands upon a sufficient showing of need. TWTC maintains that NANPA's denial of numbering resources to TWTC serves only to interfere with TWTC's ability to provide service to its customer. In fact, TWTC believes that it is possible, if not likely, that if it is ultimately unable to provide the customer with the requested numbering resources, it could lose this long-standing – and growing - customer. As such, TWTC will suffer a significant competitive harm.

12. Finally, TWTC requests the Commission to conduct its review on an expedited basis. In support of this request, TWTC notes that a contract with its customer was entered into on June 15, 2009, and that a specific request was made by the customer on June 6, 2013. These

documents are provided as composite Attachment 3 to this Petition, and include the customer's name, address, and telephone number, as required by Order No. PSC-01-1973-PCO-TL.

WHEREFORE, TWTC respectfully requests that:

1. The Commission conduct an expedited review of NeuStar's decision to deny TWTC's request for additional numbering resources for the Tampa Central Rate Center; and
2. The Commission direct NeuStar to provide numbering resources in the Tampa Central Rate Center to meet the specific request of TWTC on behalf of its customer, as discussed above.

Respectfully submitted this 14th day of June, 2013.

tw telecom of florida, l.p.

By:




Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition was served via Electronic Mail this 14th day of June, 2013 to the following:

Adam Teitzman, Attorney Supervisor
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us

NANPA
Thomas Foley
NPA Relief Planner
820 Riverbend Blvd.
Longwood, Florida 32779-2327
thomas.foley@neustar.biz



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

ATTACHMENT 1

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 813-TAMPACEN-FL-651856
Individual Block Request

Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: TW TELECOM OF FLORIDA L/P. - FL

Headquarters Address: 5700 S. Quebec Street

City, State, Zip: Greenwood Village, CO, 80111

Contact Name: Josefina Musquiz

Contact Address: 5700 S. Quebec Street

City, State, Zip: Greenwood Village, CO, 80111

Phone: 303-566-1878 FAX: 303-566-1850 E-mail: josefina.musquiz@twtelecom.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 ⁱⁱⁱ

NPA: 813 LATA: 952 OCN: ^{iv} 7635 Parent Company's OCN 7178

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
TAMQFLPMDS3

City or Wire Center Name : _____ Rate Center: ^{vi} TAMPACEN
Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 06/13/2013 Requested Block Effective Date: ^{viii} 07/14/2013

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) 813-513-7 1st choice 813-513-8 2nd choice
- 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.

Josefina Musquiz

Signature of Block Applicant

Network

Code

Administrator

II

Title

06/13/2013

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 TelcordiaTM 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 CLLITM 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 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 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 :

ⁱ Identify the type of change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} 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) (732-699-6700).

^v 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 CLLITM code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} 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.

^{viii} 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).

^{ix} Select if you are the current Block Holder.

^x Select if you are not the current Block Holder

^{xi} Telcordia, LERG Routing Guide, and CLI are trademarks of Telcordia Technologies, Inc.

Appendix 3

May 16, 2008

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

Tracking Number: 813-TAMPACEN-FL-651856

Date: 06/13/2013

OCN:7635

Company Name:TW TELECOM OF FLORIDA
L/P. - FL

Rate Center: TAMPACEN

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):813 314 2000-2999 813 449 4000-9999 813 826 0000-9999 813 827 0000-9999 813 828 0000-9999 813 830 4000-5999 813 830 6000-7999 813 384 4000-6999 813 387 0000-9999 813 529 0000-9999 813 386 0000-9999 813 676 0000-9999 813 496 4000-4999, 7000-7999

Name of Block Applicant:Josefina Musquiz


Signature: Josefina Musquiz


Title:Network Code Administrator II


Telephone No.: 303-566-1878


FAX No.: 303-566-1850

E-mail: josefina.musquiz@twtelecom.com

A. Available Numbers: 

B. Assigned Numbers: 

C. Total Numbering Resources 

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

H. Months to Exhaust⁵ =
$$\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	[REDACTED]	12.237

I. Utilization⁶ =
$$\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers(D)}}{\text{Total Numbering Resources(C)} - \text{Excluded Numbers(D)}} \times 100 = 95.494$$

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 (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 00104, section

52.15 (g)(3)(ii)

200

ATTACHMENT 2

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 813-TAMPACEN-FL-651856

Date of Application: 06/13/2013 Effective Date: _____
Date of Receipt: 06/13/2013 Date of Response: 06/13/2013

Service Provider Name: TW TELECOM OF FLORIDA L/P. - FL
(Telcordia™ LERG™ Routing Guide) OCN: 7635
Parent Company OCN: 7178

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 TAMQFLPMS3
Rate Center: TAMPACEN
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.)

ATTACHMENT 3

Redacted

Voice Service Order Form



Contract Classification
NEW

 Master Services Agreement on File
 TWTC Standard Terms and Conditions on File

Date of Original on File:	0/0/00
Date of Original on File:	11/29/05

This Service Order is entered into by tw telecom holdings Inc. by and through its wholly owned subsidiaries that are certified to provide the services being ordered hereunder (collectively "TWTC") and [redacted] ("Customer"). It is effective upon execution by both Parties ("Effective Date").

The voice services described herein are governed by TWTC's applicable tariff or price list on file with the state public utilities commission or similar regulatory body (or, in the states of Oregon, Kentucky, Washington, North Carolina, Ohio and Indiana, they are governed by TWTC's Standard Terms and Conditions or Master Services Agreement executed by Customer, and in Ohio by TWTC's service catalog posted at www.twtelecom.com).

Federal Subscriber Line Charges ("FSLC") will be assessed for VersiPak, ISDN PRI's, Digital and Analog Trunks, and Business Line services, but not for Voice T1, IP Trunks, or VersiPak bundles. Updated FSLC rates are posted to the TWTC web site at www.twtelecom.com and are subject to change. Additional charges may be assessed if Customer causes a delay in installation, or requires an extension of a network demarcation or inside wiring.

Customer may not use the services to provide voice content related services including, without limitation, chat lines. If Customer breaches this provision, TWTC may immediately terminate or suspend the services ordered hereunder and collect any applicable termination charges. Customer agrees to notify TWTC immediately if it breaches this provision. Customer is solely liable for and will indemnify, defend and hold TWTC harmless from all claims, demands, costs, damages, losses, liabilities and expenses of any nature arising from such breach, plus any costs and attorneys' fees incurred by TWTC in enforcing this provision.

Customer may not use the voice services as a substitute for carrier interconnection or switched access services and must immediately notify TWTC if it does so. If Customer is using service to support prepaid calling card calls, Customer acknowledges that any use of service for the transport of originating or terminating pre paid calling card traffic is subject to the requirements outlined in the order contained in FCC 08-79 (June 30, 2008). Customer agrees to remit any intrastate or interstate access charges directly to the appropriate carrier. TWTC may disconnect services if the violation is not cured within 10 days following written notice. Customer must indemnify, defend and hold TWTC harmless from all claims, demands, damages and expenses arising from or related to Customer's breach of this provision. TWTC does not support resale of switched services to end users including, but not limited to, support for E911 addressing, local number portability, calling name delivery, end user billing, and directory listings unless special arrangements are agreed to in writing by TWTC.

Services provided herein are not designed for, but may be capable of being used by Customers with, remote metering, supervisory control and alarm signaling. To the extent Customer uses services to facilitate remote metering, supervisory control and alarm signaling purposes, Customer is solely responsible for ensuring compatibility. Customer agrees that TWTC has no responsibility or liability for Customer's use of the Services for remote metering, supervisory control and/or alarm signaling.

Access to Emergency Services: Customer acknowledges and understands that in the event 911 is dialed all voice services are configured to provide only the Customer's Billing Telephone Number ("BTN") and the physical service address for the BTN to emergency response organizations (911/E911 or Public Safety Answering Point "PSAP"). Calls to 911 that originate on InterCity Switched Service ("ISS") and Local Reach Service will be completely blocked. Calls to 911 that originate on Expanded Exchange Service ("EES"), or from locations other than the Customer's physical service address associated with the BTN, will not be directed to a PSAP capable of responding to the emergency condition. Additionally, TWTC cannot identify, control or track the location of individual end-user stations, or the method of connecting end-user stations configured by Customer. Neither TWTC nor its affiliates are responsible for providing end user location information to the E911 system. If Customer uses any form of Private Switch/Automatic Location Identification ("PS/ALI") capability to identify individual stations from which E911 calls originate, Customer must first arrange in writing with TWTC to obtain a special E911 feature or else emergency authorities will not be able to identify individual station locations.

Upon expiration of a term contract, the service term will automatically renew at the same terms and conditions for successive 12-month terms (or as otherwise stated in the Standard Terms and Conditions if applicable) unless either party notifies the other in writing thirty (30) days prior to the expiration of the then current term that it wishes to terminate the service.

Customer and the individual signing below represent that such individual has the authority to bind Customer to this Agreement.

Customer Name: [redacted]	
Service Address: [redacted]	Billing Address: [redacted]
Term: [redacted]	

Grand Total (Detailed Price Description Below)	Monthly Recurring Charges "MRC" [redacted]	Non-Recurring Charges "NRC" [redacted]
--	--	--

tw telecom holdings Inc.
 Signature: [Signature]
 Print Name: Rich Santoro
 Title: VP
 Date: 6/22/09
 Sales Person: Gavin Gallagher

Customer: [redacted]
 Signature: [redacted]
 Print Name: [redacted]
 Title: [redacted]
 Date: 15 June 2009

Special Provisions for Individual Telephone Number (ITN's): Excluding Services provided in Texas and Hawaii, each ITN requested by Customer hereunder, either at the time of this Service Order or thereafter, will be charged at \$0.15 MRC and \$0.35 NRC. ITN rates for Services provided in Hawaii and Texas are specified in TWTC's applicable tariffs.

Special Provisions for Toll Free Numbers (8xx): Each Toll Free Number requested by Customer hereunder, either at the time of this Service Order or thereafter, will be charged at \$15.00 NRC.

VOICE SERVICES: VOICE T1	Unit Price	Quantity	Monthly Total	Unit Install	Total Install
--------------------------	------------	----------	---------------	--------------	---------------

Voice T1 - 2Way (PRI)	Flat		4			
<Select Service>	<Select Usage Type>					
<Select Service>	<Select Usage Type>					
<Select Service>	<Select Usage Type>					
Voice T1 Feature	Please describe					
Voice T1 Feature	Please describe					
Voice T1 Feature	Please describe					

VOICE SERVICES: INDIVIDUAL TELEPHONE NUMBERS (ITN's)	Unit Price	Quantity	Monthly Total	Unit Install	Total Install
Individual Telephone Number (ITN)					
ITN - 100 numbers or less (HI)					
ITN - greater than 100 (HI)					

LONG DISTANCE SERVICES (NON-USAGE):	Unit Price	Quantity	Monthly Total	Unit Install	Total Install
Dedicated Access Facility - Digital Signal					
Dedicated Access Facility - PRI Signal					
Account Codes					
Toll Free					
Toll Free Special Routing					
Toll Free Vanity Number					
Toll Free Directory Listing					
Other: Please describe					

LONG DISTANCE SERVICES (USAGE):	Monthly MOU (3)		1+ Intrastate / Intralata RPM (1)	1+ Interstate RPM	8xx Intrastate / Intralata RPM (1)	8xx Interstate RPM
TWTC Long Distance:						
VoIP VPN 1+ Site to Site Calling (4)						
Long Distance 1+	500,000					
Long Distance 8xx	200,000					
Long Distance Bundle Pkgs:	Package MOU (3)	MRC	1+ Add'l Intrastate / Intralata RPM (2)	1+ Add'l Interstate RPM (2)	8xx Add'l Intrastate / Intralata RPM (2)	8xx Add'l Interstate RPM (2)
VoIP VPN 1+ Site to Site Calling (4)						
Bundled Long Distance 1+/8XX	20,000					
Add'l Bundled Long Distance 1+/8XX (BOB's)						
Add'l Interstate Long Distance Bundle (ICB only)						
Add'l Intrastate/Intralata Long Dist. Bundle (ICB Only)						
Switchless:						
Long Distance Switchless 1+						
Long Distance Switchless 8xx						
Other:						
Calling Card Service						
International Bundled Long Distance Bundles:	Package	MRC	Additional International Landline RPM (2)			
WorldZone 1: Canada	5,000		Canada: \$			
WorldZone 2: Mexico			Mexico: Band 1: \$, Band 2: \$, Bands 3-8: \$			
WorldZone 3: United Kingdom, France, Ireland,			United Kingdom: \$, France: \$, Ireland: \$, Germany: \$			
WorldZone 4: Israel, Poland			Israel: \$0.05, Poland: \$0.06			
WorldZone 5: Russia			Russia: \$			
WorldZone 6: Ecuador, El Salvador, Guatemala,			Ecuador: \$, El Salvador: \$, Guatemala: \$, Nicaragua: \$			
WorldZone 7: Argentina, Chile, Portugal, Spain			Argentina: \$, Chile: \$, Portugal: \$, Spain: \$			
WorldZone 8:			Bahrain: \$, Iran: \$, Iraq: \$, Lebanon: \$, Saudi Arabia: \$			
WorldZone 9: Brazil, Venezuela			Brazil: \$, Venezuela: \$			
WorldZone 10: India, Pakistan, Sri Lanka			India: \$, Pakistan: \$, Sri Lanka: \$			
WorldZone 11: China, Hong Kong, Japan, South Korea, Taiwan			China: \$, Hong Kong: \$, Japan: \$, South Korea: \$, Taiwan: \$			

By contracting for Long Distance Product(s), including without limitation minutes incorporated into bundled or integrated packages, Customer acknowledges that Customer has selected TWTC as the IntraLATA and InterLATA Long Distance toll provider.

- (1) RPM = rate per minute
- (2) Add'l RPM = The rate per minute that will be charged after the amount of the packaged minutes are used
- (3) MOU = Minutes of Use
- (4) VoIP VPN Site to Site Calling is designated to 1+ calls that originate and terminate on the TWTC Network.
- (5) International packaged minutes are for land line terminated calls only. Mobile terminated calls are not included and are charged at standard rates.
- (6) For Additional Long Distance Bundles, in order to be eligible for this product, the monthly long distance traffic must be at least 40% interstate.
- (7) For Additional Long Distance Bundles, Customer understands and accepts that if for three consecutive months the IntraLata/IntraState MOU makes up more than 60% of the overall monthly traffic, TWTC has the right to remove the bundle and change the rate per minute to the pre-defined tariff rate

International Blocking Option: Customer accepts international toll blocking option - Customer Representative Initials: _____

For additional information regarding international toll blocking and international/offshore pricing (including Alaska, Hawaii, Puerto Rico, US Virgin Islands and Guam) for TWTC long distance services, please refer to the appropriate TWTC interstate or international Terms and Conditions/Price List documents available at www.twtelecom.com. For Dedicated Long Distance Services, Customer understands and accepts that if, any local calls are routed over the dedicated access facility, each call will be charged a Long Distance rate per minute. It is the Customer's responsibility to route all of its local calls over its local facility.

VOICE SERVICES TOTAL					
LONG DISTANCE SERVICES TOTAL					

TOTAL MONTHLY RECURRING AND NON-RECURRING CHARGES			
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[REDACTED]

[REDACTED]

June 6, 2013

Gavin Gallagly

Account Executive

TW Telecom Holdings, Inc.

3030 N Rocky Point Drive W

Suite 850

Tampa, FL 33607

Dear Gavin,

By receipt of this communication, please be advised that [REDACTED] is requesting you acquire a new exchange in order to accommodate current and future growth. [REDACTED] is expanding its presence here in the Tampa Bay Area. In addition, [REDACTED] is networking PBX systems around the world and the lack of contiguous numbers is inhibiting our ability to do so.

[REDACTED] Our office here in Tampa provides mission simulation and networking our offices is critical. We [REDACTED]

Should you have any question please feel free to reach out to me at [REDACTED]

Regards,

[REDACTED]

[REDACTED]

[REDACTED]