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October 17, 2013

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

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13 OCT 17 PM 4:19
COMMISSION
CLERK

Re: Docket No.: _____
**Petition for Expedited Review of Growth Code Denials by the
Number Pooling Administrator for the Orange Park exchange**

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 above 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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth) Docket No.
Code Denial by the Number Pooling Administrator) Filed: October 17, 2013
For the Orange Park Exchange (JCVLFLCLDS6))

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

TCG South Florida (“TCG”), 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-01-1873-PCO-TL, petitions the Commission to review the Pooling Administrator’s (“NeuStar”) denial of TCG’s request for additional numbering resources in the Orange Park rate center. In support of this petition, TCG states:

PARTIES

1. TCG is a corporation organized and formed under the laws of the State of New Jersey.
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 over 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 and seek review of NeuStar’s decision to deny numbering resources to the appropriate regulatory authority.

BACKGROUND AND REQUEST FOR RELIEF

4. The Orange Park rate center consists of one (1) switching entity that utilizes numbering resources: JCVLFLCLDS6.

5. On October 7, 2013 TCG requested 1000 consecutive numbers from NeuStar for the Orange Park rate center to satisfy a customer's specific request. The request specified that the numbers be a 1 thru 7 block.

6. At the time of the code request, the Orange Park rate center had a MTE of 2.7 and a utilization of 67.4%.

7. On October 7, 2013, NeuStar denied TCG's request because TCG had not met the utilization based criteria, notwithstanding the fact that TCG 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 contact information. See Attachment 2.

8. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the 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 a customer's 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 looks only 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. TCG requests that the Commission's reverse NeuStar's decision to withhold numbering resources from TCG on the following grounds:

(a) NeuStar's denial of numbering resources to TCG interferes with TCG's ability to serve its customers within the State of Florida.

(b) As a result of NeuStar's denial of TCG's request for additional numbering resources, TCG will be unable to provide telecommunications services requested by its customers.

WHEREFORE, for the reasons stated above, TCG respectfully requests:

1. The Commission review the decision of NeuStar to deny TCG's request for additional numbering resources for the Orange Park rate center; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Orange Park rate center as discussed above.

Respectfully submitted this 17th day of October 2013

TCG SOUTH FLORIDA



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Suite 400
Tallahassee, Florida 32301
(305) 347-5558

ATTACHMENT 1

(REDACTED)

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 904-ORANGEPARK-FL-677649
Individual Block Request

Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: TCG SOUTH FLORIDA
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: ⁱⁱ

Contact Name: Dara Flowers
Contact Address: 1800 Sutter St
City, State, Zip: Concord, CA, 94520
Phone: 925-383-8730 FAX: 925-363-7697
E-mail: dara.flowers@neustar.biz

1.2 General Information:

Check one : No LRN needed LRN needed

NPA: 904 LATA: 452 OCN: ^{iv} 8300 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
JCVLFLCLDS6

City or Wire Center Name : _____ Rate Center: ^{vi}
JCVLFLCLDS6 ORANGEPARK

Rate Center Sub Zone: ORANGEPARK

1.3 Dates:

Date of Application: ^{vii} 10/07/2013 Requested Block Effective Date: ^{viii} 11/07/2013

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

Sr.
Specialist
= 10/07/2013
Network
Support
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

Appendix 3

May 16, 2008

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

Tracking Number: 904-ORANGEPARK-FL-677649

Date: 10/07/2013

OCN: 8300

Company Name: TCG SOUTH FLORIDA

Rate Center: ORANGEPARK

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 904-622-A,9

Name of Block Applicant: [REDACTED]

Signature: [REDACTED]

Title: Sr. Specialist - Network Support

Telephone No.: [REDACTED]

FAX No.: [REDACTED]

E-mail: [REDACTED]@att.com

A. Available Numbers: [REDACTED]

B. Assigned Numbers: [REDACTED]

C. Total Numbering Resources: [REDACTED]

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²: [REDACTED]

List Excluded Code(s) or Block(s): [REDACTED]

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]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

E. Growth History - Previous 6 [REDACTED]

months³

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
=
Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	[REDACTED]	2.708

I.
Utilization⁶ = $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = 67.4$

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))

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November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 904-ORANGEPARK-FL-677649

Date of Application: 10/07/2013 Effective Date: _____
Date of Receipt: 10/07/2013 Date of Response: 10/07/2013

Service Provider Name: TCG SOUTH FLORIDA
(Telcordia™ LERG™ Routing Guide) OCN: 8300
Parent Company OCN: 7126

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Dara Flowers Phone: 925-363-8730

Signature of Pooling Administrator

Dara Flowers Fax: 925-363-7897

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 JCVLFLCLDS6

Rate Center: ORANGEPARK

Rate Center Sub Zone: ORANGEPARK

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.

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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™ 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 2

(REDACTED)

Orange Park
Utilization Summary
Report

Attachment 2

Customer Contact Information

