



Tracy W. Hatch  
General Attorney

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COMMISSION  
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November 25, 2013

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FILED NOV 25, 2013  
DOCUMENT NO. 07148-13  
FPSC - COMMISSION CLERK

DOCKET NO. 130280-TL

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

**Re: Docket No.:** \_\_\_\_\_  
**Petition for Expedited Review of Growth Code Denials by the  
Number Pooling Administrator for the Yulee 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  
Gregory R. Follensbee  
Suzanne L. Montgomery

COM \_\_\_\_\_  
AFD \_\_\_\_\_  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
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IDM \_\_\_\_\_  
TEL 5  
CLK \_\_\_\_\_

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Expedited Review of Growth ) Docket No.  
Code Denials by the Number Pooling Administrator )  
for the Yulee exchange (Main) ) Filed: November 25 2013  
\_\_\_\_\_)

**PETITION FOR EXPEDITED REVIEW OF NXX-X 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 Florida Public Service Commission (“Commission”) Order No. PSC-01-1973-PCO-TL, petitions the Commission to review the Pooling Administrator’s (“NeuStar’s”) denial of AT&T Florida’s requests for additional numbering resources in the Yulee exchange. In support of this petition, AT&T Florida states:

**PARTIES**

1. AT&T Florida is a corporation organized and formed under the laws of the State of Georgia and an incumbent local exchange company (“ILEC”) regulated by the Commission and 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 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.

## BACKGROUND AND REQUEST FOR RELIEF

4. The Yulee exchange consists of one central office and one switching entity that utilize numbering resources: Main (YULEFLMARS0).

5. On November 21, 2013, AT&T Florida requested additional numbering resources from NeuStar for the Yulee Main (YULEFLMARS0) switch. See Attachment 1. Specifically, AT&T Florida requested 1,000 consecutive numbers for a specific customer.

6. At the time of the code request, the Yulee exchange had a MTE of 14.695 and a utilization of 54.67%.

7. On November 21, 2013, 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 earlier MTE procedures used by NAMPA, 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, neither NeuStar nor 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 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 within the State of Florida.

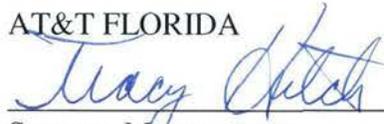
(b) As a result of Neustar's denial of AT&T Florida's request for additional numbering resources, AT&T Florida will be unable to provide telecommunications services to its customers in Florida law.

WHEREFORE, AT&T Florida requests:

1. The Commission review the decision by NeuStar to deny AT&T Florida's request for additional numbering resources for the Yulee exchange; and
2. The Commission direct NeuStar to provide the requested numbering resources for the Yulee exchange as discussed above.

Respectfully submitted this 25th day of November 2013.

AT&T FLORIDA



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

# Pooling Administration System

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TBPAG Attachment 1 - March 19, 2007

-  Individual Block Requests
-  CO/NXX Code Requests
-  Withdraw Pending Requests
-  Confirm Resources In Service
-  Donate Blocks
-  Submit Forecast
-  Search Forms
-  Reports
-  User Profile

## Thousands-Block Application Form - Part 1A

**Tracking Number:** 904-YULEE-FL-687066  
**Type of Application:** Individual Block Request

**Type of Application:**  New  Change  Disconnect

### GENERAL APPLICATION INFORMATION

#### 1.1 Contact Information:

Block Applicant:

**Company Name:** BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

**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: <sup>ii</sup>

**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 <sup>iii</sup>

**NPA:** 904 **LATA:** 452 **OCN:** <sup>iv</sup> 9417 **Parent Company's OCN** 9417

**Number of Thousands-Blocks Requested :** 1

Switching Identification(Switch Entity/POI) : <sup>v</sup> YULEFLMARS0

City or Wire Center Name : \_\_\_\_\_

Rate Center: <sup>vi</sup> YULEE

Rate Center Sub Zone: \_\_\_\_\_

**1.3 Dates:**

Date of Application: <sup>vii</sup> 11/21/2013 Requested Block Effective Date: <sup>viii</sup> 12/22/2013

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 : Incumbent Local Exchange Carrier (ILEC) (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 <sup>ix</sup>  Switching Id  Part  
1B

OCN:Inter-company <sup>x</sup>  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](mailto:inc@atis.org) as of the date of this application.

 <b>Signature of Block Applicant</b>	<b>Sr. Specialist</b> <b>Title</b>	<b>11/21/2013</b> <b>Date</b>
--	---------------------------------------	----------------------------------

**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 CLLI™ tandem of the facilities based provider<sup>xi</sup>. 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 :**

<sup>i</sup> Identify the type of change(s) in Section 1.5.

<sup>ii</sup> 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 CLLI™ 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 CLLI are trademarks of Telcordia Technologies, Inc.

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# Pooling Administration System

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- Individual Block Requests
- CO/NXX Code Requests
- Withdraw Pending Requests
- Confirm Resources In Service
- Donate Blocks
- Submit Forecast
- Search Forms
- Reports
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Appendix 3

May 16, 2008

## MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level<sup>1</sup>

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **904-YULEE-FL-687066**

Date: **11/21/2013** OCN: **9417** Company Name: **BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL**

Rate Center: **YULEE**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):

Name of Block Applicant: [Redacted] Signature: [Redacted]

Title: **Sr. Specialist** 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 <sup>2</sup>: [Redacted]

List  
Excluded  
Code(s)  
or  
Block(s):

Month												
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	

E. Growth History - Previous 6 months<sup>3</sup>

	■	■	■	■	■	■
--	---	---	---	---	---	---

F. Forecast  
- Next 12  
months<sup>4</sup>



G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6) ████████

H. Months  
to  
Exhaust<sup>5</sup>  
=

Numbers Available for Assignment to  
Customers(A)

Average Monthly Forecast(G)

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
<b>1</b>	<span style="background-color: black; color: black;">████████</span>	<b>14.695</b>

I.  
Utilization<sup>6</sup>  
=

Assigned Numbers(B) - Excluded X 100 =  
Numbers(D) **54.669**

Total Numbering Resources(C)-Excluded  
Numbers(D)

Explanation: \_\_\_\_\_

<sup>1</sup>A 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.

<sup>2</sup>Quantity 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).

<sup>3</sup>Net 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.

<sup>4</sup>Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>5</sup>To 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)).

<sup>6</sup>Newly 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  
TBPAQ Part 3**

**Tracking Number :** 904-YULEE-FL-687066

Date of Application: 11/21/2013      Effective Date: \_\_\_\_\_  
Date of Receipt: 11/21/2013      Date of Response: 11/21/2013

Service Provider Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL  
(Telcordia™ LERG™ Routing Guide ) OCN: 9417  
Parent Company OCN: 9417

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): <sup>1</sup> YULEFLMARS0  
Rate Center: YULEE  
Rate Center Sub Zone: \_\_\_\_\_

X **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:

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**Remarks:**

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<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> 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.)

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## Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)<sup>1</sup>

Your Utilization calculates to **54.669%**. The FCC required the utilization of **75.000%**.  
You have requested more blocks than you will exhaust in six months.

### Select One Option and Submit

- Return to the Months To Exhaust Form
- Need to request a State Waiver
- Received a State Waiver
- Over-Contaminated Block Exception



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Customer Contact Information

