



Tracy W. Hatch
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FILED FEB 16, 2015
DOCUMENT NO. 01006-15
FPSC - COMMISSION CLERK

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th9467@att.com

REDACTED

October 17, 2013

Carlotta S. Stauffer, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECEIVED-FPSC
15 FEB 16 PM 4:40
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. Stauffer:

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
Elise R. McCabe

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL 3
IDM _____
TEL 4
CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review of Growth) Docket No.
Code Denial by the Number Pooling Administrator) Filed: February 16, 2015
For the Pensacola rate center)

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

TCG South Florida, LLC (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 Pensacola rate center. In support of this petition, AT&T 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 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 Pensacola rate center consists of one (1) switching entity that utilizes numbering resources: ORLDFLMAGT0.
5. On January 7, 2015 AT&T requested 5000 consecutive numbers from NeuStar for the Pensacola rate center to satisfy a customer’s specific request.

6. At the time of the code request, the Pensacola rate center had a MTE of .667 and a utilization of 49.4%.

7. January 7, 2015, 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 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. 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's reverse NeuStar's decision to withhold numbering resources on the following grounds:

(a) NeuStar's denial of numbering resources to AT&T interferes with AT&T's ability to serve its customers within the State of Florida.

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

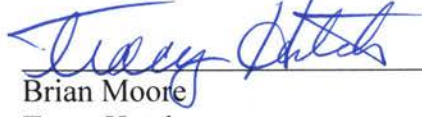
WHEREFORE, AT&T requests:

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

2. The Commission direct NeuStar to provide the requested numbering resources for the Pensacola rate center as discussed above.

Respectfully submitted this 16th day of January 2015

TCG SOUTH FLORIDA, LLC

A handwritten signature in blue ink, appearing to read "Tracy Hatch", is written over a horizontal line.

Brian Moore

Tracy Hatch

c/o Elise R. McCabe

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(850) 425-6360

ATTACHMENT 1

(REDACTED)

TBPAG Attachment 1 - March 19, 2007

Thousands-Block Application Form - Part 1A

Tracking Number: 850-PENSACOLA-FL-794574
Full NXX: Pool Replenishment

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: 925-363-8730 FAX: 925-363-7697
E-mail: dara.flowers@neustar.biz

1.2 General Information:

Check one : No LRN needed LRN needed ⁱⁱⁱ

NPA: 850 LATA: 448 OCN: ^{iv} 8300 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 5

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

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

Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 01/07/2015 Requested Block Effective Date: ^{viii}
03/14/2015

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? (Sec 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) 850-xxx-3, 850-xxx-4, 850-xxx-5, 850-xxx-6, 850-xxx-7
- 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) N/A

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 01/07/2015
Administration

Title Date

Instructions for filling out each Section of the Part IA 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 TelcordiaTM LERGTM 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 TeleordiaTM 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 CLITM 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 /POL.

^{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.

Central Office Code (NXX) Assignment Request
Part 1 December 9, 2005

Tracking
Number: 850-PENSACOLA-FL-794574

Full NXX: Pool
Replenishment

Type of Application: New | Change Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: TCG SOUTH FLORIDA

Headquarters Address: ██
City, State, Zip: ██

Contact Name: ████████████████████
Contact Address: ██
City, State, Zip: ██

Phone: ████████████████████ mail: ██████████@att.com FAX: ████████████████████ E-██████████████████

Code Administrator: ²

Name: Michael Ortega
Address: 46000 Center Oak Plaza
City, State, Zip: Sterling, VA, 20166
Phone: 571-434-5348 FAX: 571-434-5502

1.2 NPA: 850 NXX: ³ 8300 LATA: 448 OCN: ⁴ 7125
Parent Company's OCN(s)

Switching Identification(Switch Entity/POI) ⁵
PNSCFLWAXBX

Locality/City/Wire Center: Rate Center: ⁶
PENSACOLA

Homing Tandem Operating Co: ⁷ Tandem Homing
ATT CLLI
⁸ :PNSCFLWA01T

1.3 Dates: Date of Request Effective Date: ⁹ ¹⁰

Application: 01/07/201503/14/2015

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? Yes No 1.4 a) Type of company/entity requesting the code: CAP OR CLEC
(LEC, IC, CMRS, Other)b) Types of service: Wireline (e.g., Cellular - Type 2)c) Code Assignment Preference (Optional) 850-xxx-3, 850-xxx-4,
850-xxx-5, 850-xxx-6, 850-xxx-7

d) Codes that are undesirable, if any _____

e) Type of change (Mark all that apply)OCN-Intra-company ¹¹ Switching Id Rate Center Tandem
Homing CLLIOCN-Inter-company ¹² Effective Date LATA Extend
Reservation1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ Yes No


1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain): _____

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45-calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/inedocs.htm>) as of the date of this application: ¹⁴


Signature of Code Applicant

Manager-Code 01/07/2015
Administration
Title Date

- ¹ Identify type and reason for change(s) in Section 1.4(e).
- ² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.
- ³ The NXX field is required for any code request in which there is a change or the NXX is being returned.
- ⁴ 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 may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.
- ⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)
- ⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.
- ⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.
- ⁸ 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, and is the same on Part 2, Form 1, Page 2 of 2.
- ⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.
- ¹⁰ Requests for code assignment shall not be made more than six months prior to the requested effective date.

- 11 Select if you are the current Code Holder
- 12 Select if you are not the current Code Holder
- 13 The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.
- 14 An incomplete form may result in delays in processing this request.

Appendix 3

May 16, 2008

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

Tracking Number: 850-PENSACOLA-FL-794574

Date: 01/07/2015

OCN: 8300

Company Name: TCG SOUTH FLORIDA

Rate Center: PENSACOLA

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): 850 462 6 850 483 6

Name of Block Applicant: [REDACTED]

Signature: [REDACTED]

Title: Manager-Code Administration

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):

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 months³: [REDACTED]

F. Forecast
- Next 12
months⁴



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



H. Months
to Exhaust⁵

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested	Available Numbers	Months To Exhaust
1	[REDACTED]	0.667
2	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]

I.

Utilization⁶ $\frac{\text{Assigned Numbers(B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = 49.4$

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

Explanation: _____

¹ 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.

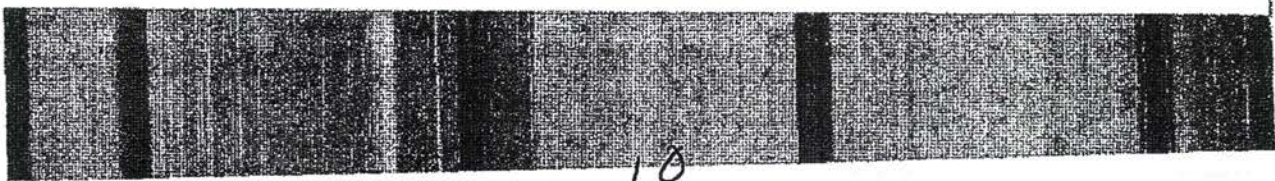
² Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³ 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.

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

⁵ 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)).

⁶ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section



MTE Block

Page 3 of 3

52.15 (g)(3)(ii)

LOPER, LISA A

From: dara.flowers@neustar.biz
Sent: Wednesday, January 07, 2015 4:59 PM
To: [REDACTED]
Cc: PA_Part3@neustar.biz
Subject: PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 850-PENSACOLA-FL-794574

Pooling Administration System

Dated 07-January-2015

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 850-PENSACOLA-FL-794574

Date of Application: 01/07/2015 Effective Date: _____
Date of Receipt: 01/07/2015 Date of Response: 01/07/2015

Service Provider Name: TCG SOUTH FLORIDA
(Telcordia™ LERG™
Routing Guide) OCN: 8300
Parent Company OCN: 7125

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

PNSCFLWAXBX

Rate Center:

PENSACOLA

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 code 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 2

(REDACTED)

ATTACHMENT 2



FLORIDA DEPARTMENT OF MANAGEMENT SERVICES

telecommunications

We serve those who serve Florida

4030 Esplanade Way
Tallahassee, FL 32399-0000
Tel: 904-410-5754 | Fax: 904-422-6145

4030 Esplanade Way

4030 Esplanade Way

January 21, 2015

AT&T Southeast
1820 East Park Avenue, Suite 200
Tallahassee, FL 32301

To Whom It May Concern,

This Letter of Intent (LOI) represents a request by the State of Florida, [REDACTED] for [REDACTED] service. The State of Florida, [REDACTED] intends to order service, in the Pensacola rate center, on the ORLDFLMAGT0 switch pending AT&T's successful completion of the required testing. The State of Florida, Escambia County Sheriff intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

These numbers are to be used for a [REDACTED] for the State of Florida, Escambia County Sheriff's Office.

There is no anticipated growth over the next 3 years.

Sincerely,

Kevin T. Langston, Chief
Bureau of Customer Service
Florida Department of Management Services
Division of Telecommunications
4030 Esplanade Way
Tallahassee, FL 32399