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July 2, 2015 – VIA OVERNIGHT DELIVERY

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

REDACTED

RECEIVED FPSC
15 JUL -6 PM 1:21
COMMISSION
CLERK

Re: Petition of Verizon Florida LLC for Expedited Review of NeuStar's Denial of
Application for Numbering Resources

Dear Ms. Stauffer:

Pursuant to Section 364.183(3), Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Verizon Florida LLC (Verizon) hereby makes a claim of confidentiality for information contained in Exhibits 1 and 3 attached to the above-referenced Petition. Exhibit 1 concerns a customer request for the assignment of telephone numbers that Verizon regards as confidential. Exhibit 3 concerns confidential information that reflects the number of telephone numbers being assigned in the Tampa Central rate center.

One highlighted copy of the confidential information is enclosed in a sealed envelope. Two redacted copies of the information are also included. If you have any questions regarding this information, please contact me.

Sincerely,

Dulaney L. O'Roark III

Enclosures

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida LLC for) Docket No.
Expedited Review of NeuStar's Denial)
Of Application for Numbering Resources) Filed: July 6, 2015

PETITION OF VERIZON FLORIDA LLC FOR EXPEDITED REVIEW OF NEUSTAR'S DENIAL OF APPLICATION FOR NUMBERING RESOURCES

Verizon Florida LLC (Verizon) requests that the Commission review the Pooling Administrator's denial of Verizon's application for a Ten Thousand Block of telephone numbers (Ten Thousand Block) in the Tampa Central, Florida rate center, overturn that decision, and order that a Ten Thousand Block be assigned to Verizon. In support of this Petition Verizon states:

PARTIES

1. Verizon is a local exchange telecommunications company that provides local exchange service and exchange access service in Florida.
2. NeuStar is an independent non-governmental entity that 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 under Section 364.16(7), Florida Statutes.

BACKGROUND AND REQUEST FOR RELIEF

4. A large business customer that uses a direct inward dialing (DID) arrangement has requested that Verizon provide a Ten Thousand Block in the 813 NPA in the Tampa Central rate center so the customer can address

expected growth. A confidential copy of the customer's letter explaining the circumstances is attached as Confidential Exhibit 1.

5. Because Verizon does not have a Ten Thousand Block in its inventory, it applied on June 29, 2015 to the Pooling Administrator, NeuStar, for a Ten Thousand Block in the Tampa Central rate center. Verizon's application is attached as Exhibit 2.

6. NeuStar denied Verizon's request on June 29, 2015. The request was denied because Verizon did not meet the two FCC criteria that NeuStar applies, even though Verizon does not have the numbering resources needed to satisfy its customer's request. Specifically, Tampa Central rate center's months-to-exhaust calculation was longer than six months and its number utilization of 59.84% was under the FCC's 75% threshold. The Months-to-Exhaust and Utilization Worksheet is attached as Confidential Exhibit 3. NeuStar's denial of Verizon's application is attached as Exhibit 4.

7. The FCC has delegated authority to the Commission to address NeuStar's denial of a request for numbering resources, stating that "[w]e agree . . . that a safety valve mechanism should be established, and we delegate authority to state commissions to hear claims that a safety valve should be applied when the . . . Pooling Administrator denies a specific request for numbering resources."¹ Moreover, the FCC has determined that "a carrier should be able to get additional numbering resources when there is a verifiable need due to the

¹ *Numbering Resource Optimization*, Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, FCC 01-362, CC Docket No. 99-200, CC Docket No. 96-98, CC Docket No. 95-116, ¶ 61(2001).

carrier's inability to satisfy a specific customer request." Specifically, states "may grant requests for customers seeking contiguous blocks of numbers."²

8. Based on this authority, the Commission has issued a number of orders addressing denials by NeuStar that release numbering resources to meet specific customer needs. For example, the Commission ordered NeuStar to provide CenturyLink with numbering resources to meet the service requirements of a customer that requested 5,000 consecutive numbers, even though CenturyLink had been unable to satisfy the months-to-exhaust or utilization criteria.³

9. NeuStar's denial of sufficient numbering resources to Verizon to meet its customer's request is inconsistent with the FCC's position that "[u]nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources."⁴ By refusing to grant numbering resources sufficient to meet the needs of Verizon's customer, NeuStar is preventing this customer from obtaining the service it wants from the carrier of its choice.

10. Verizon's request for a Ten Thousand Block to meet its customer's request fits squarely within the framework established by the FCC for "safety valve" requests that the Commission is authorized to grant. Verizon respectfully

² *Id.* ¶ 64.

³ *Petition for Expedited Review of NXX-X Code Denial*, Docket No. 120041-TL, Order No. PSC-12-0089-PAA-TL (March 1, 2012).

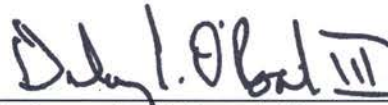
⁴ *Numbering Resource Optimization*, Second Report and Order and Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, FCC 00-429, CC Docket No. 99-200, CC Docket No. 96-98, ¶ 61 (2000).

requests that the Commission direct NeuStar to assign a Ten Thousand Block for the Tampa Central rate center so that Verizon can satisfy its customer's request.

Wherefore, Verizon respectfully requests that the Commission review NeuStar's decision to deny Verizon's request for additional numbering resources, overturn that decision, and direct NeuStar to assign Verizon a Ten Thousand Block in the Tampa Central rate center.

Respectfully submitted on July 6, 2015.

By:



Dulaney L. O'Roark III
One Verizon Place
Alpharetta, GA 30004
Telephone: 678-339-5081
de.oroark@verizon.com

Attorney for Verizon Florida LLC

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Effective June 11,2001

Appendix B

CO CODE ASSIGNMENT
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹
(Worksheet to be used for Requests for Additional Codes for Growth)

CONFIDENTIAL EXHIBIT 3

Date: 6/9/2015 Company Name: VERIZON FLORIDA INC.
Rate Center: TAMPA CENTRAL
NPA(s)-NXXs included in growth calculation:² See Attached List

Signature of Authorized Representative of Code Applicant: Theresa Rico

Title: Telephone No: 215-440-4120

FAX No: 215-625-8548

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³):

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

B. Previous 6-month growth history⁴

C. Forecast – Next months 1-12⁵

D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6):

E. Months to Exhaust⁶ Telephone Numbers (TNs) Available for Assignment(A) = 307.9

Average Monthly Forecast (D)

F. Utilization Level⁷ Telephone Numbers (TNs) Assigned * 100 = 59.84

Total Numbering Resources in Applicant's Inventory

Explanation:

REDACTED

1 A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it must be in the applicant's files.

2 Report on all resources for the requested geographic area, including newly acquired codes.

3 Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.

4 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.

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

6 To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

7 Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, § 52.15 (g) (3) (ii)).

NPA(s)-NXX-Xs included in growth calculation:

813-931, 813-983, 813-989, 813-218, 813-239, 813-241, 813-246, 813-259, 813-282, 813-318, 813-202, 813-402, 813-432, 813-552, 813-621, 813-627, 813-632, 813-671, 813-840, 813-866, 813-889, 813-932, 813-960, 813-962, 813-963, 813-987, 813-990, 813-229, 813-231, 813-237, 813-248, 813-251, 813-253, 813-281, 813-306, 813-314, 813-414, 813-483, 813-584, 813-623, 813-631, 813-637, 813-741, 813-844, 813-868, 813-876, 813-882, 813-901, 813-961, 813-976, 813-998, 813-228, 813-264, 813-265, 813-274, 813-354, 813-612, 813-617, 813-622, 813-740, 813-744, 813-832, 813-874, 813-883, 813-890, 813-935, 813-968, 813-977, 813-988, 813-209, 813-222, 813-224, 813-286, 813-288, 813-289, 813-290, 813-301, 813-307, 813-375, 813-396, 813-628, 813-663, 813-806, 813-831, 813-837, 813-870, 813-878, 813-880, 813-885, 813-903, 813-933, 813-972, 813-272, 813-276, 813-287, 813-496, 813-626, 813-674, 813-871, 813-899, 813-930, 813-978, 813-979, 813-984, 813-985, 813-216, 813-221, 813-225, 813-227, 813-232, 813-234, 813-236, 813-238, 813-247, 813-249, 813-250, 813-269, 813-273, 813-350, 813-204, 813-470, 813-554, 813-558, 813-630, 813-635, 813-636, 813-673, 813-805, 813-839, 813-872, 813-873, 813-875, 813-877, 813-879, 813-887, 813-905, 813-908, 813-910, 813-914, 813-915, 813-980, 813-226, 813-233, 813-242, 813-243, 813-254, 813-275, 813-277, 813-348, 813-351, 813-353, 813-356, 813-372, 813-615, 813-620, 813-639, 813-672, 813-677, 813-830, 813-835, 813-881, 813-886, 813-936, 813-964, 813-969, 813-971, 813-975, 813-223, 813-258, 813-357, 813-207, 813-604, 813-664, 813-801, 813-884, 813-888, 813-902

Central Office Code Assignment Guidelines(COCAG)
Central Office Code(NXX) Assignment Request - Part 1 (ATIS-0300050.p1)
December 9,2005

EXHIBIT 2

Tracking Number: FLW0002117

Type of Application:

New

Change¹

Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name:

VERIZON FLORIDA INC.

Headquarters Address:

140 WEST STREET

City,State,Zip:

NEW YORK, NY 10007 null

Contact Name:

Theresa Rico

Contact Address:

900 Race St 9th Floor

City,State,Zip:

Philadelphia ,PA 19107

Phone: 215-440-4120

Fax: 215-625-8548

E-Mail: theresa.d.rico@verizon.com

Code Administrator²:

Name:

Beth Sprague

Address:

46000 Center Oak Plaza

City,State,Zip:

Sterling ,VA 20166

Phone: 571-434-5513

Fax: 571-434-5502

1.2 NPA: 813 NXX³: LATA: 952 OCN⁴: 0328 Parent Company's OCN(s): NONE

Switching Identification (Switching Entity/POI)⁵: HYPKFLXADS0

Locality/City/Wire Center: TAMPACEN Rate Center⁶: TAMPA CENTRAL

Homing Tandem Operating Co.⁷: VERIZON FLORIDA INC. Tandem Homing CLLI^{TM 8}: TAMPFLXA02T

1.3 Dates: Date of Application: 6/9/2015

Requested Effective Date^{9 10}: 8/9/2015

1.4 a).Type of company/entity requesting the code: LEC (LEC, IC, CMRS, Other)

b).Type of service Wireline (e.g., Cellular - Type 2)

c).Code Assignment Preference (Optional) 813

d).Codes that are undesirable, if any

e).Type of change (Mark all that apply):

OCN: Intra-company¹¹ Switching Id Rate Center Tandem Homing CLLI

OCN: Inter-company¹² Effective Date LATA Extend Reservation

1.5 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.

Pool Indicator¹³: Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

Central Office Code Assignment Guidelines(COCAG)
Central Office Code(NXX) Assignment Request - Part 1 (ATIS-0300050.p1)
December 9,2005

1.7 Code request for new service (Explain): _____

- 1.8 Part 2 attached Part 2 is not attached for BIRRDs^{14 15}
 Additional Documentation is attached Additional Documentation is not attached

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 the Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<https://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application.¹⁶

Theresa Rico
Signature of Code Applicant

Code Administrator
Title

6/9/2015
Date

Central Office Code Assignment Guidelines(COCAG)
Central Office Code(NXX) Assignment Request - Part 1 (ATIS-0300050.p1)
December 9,2005

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴Operating 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 (973-884-8355) 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.

⁵This 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.)

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

TMTelcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.

⁸This 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.

⁹Code 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.

¹⁰Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹Select if you are the current Code Holder.

¹²Select if you are not the current Code Holder.

¹³The 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.

¹⁴Applicant is not required to submit Part 2 of the code request form if it is doing its own Telcordia™ Business Integrate Routing and Rating Database System (BIRRDs) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵**WARNING!** 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.

¹⁶An incomplete form may result in delays in processing this request.

From: dara.flowers@neustar.biz [<mailto:dara.flowers@neustar.biz>]
Sent: Monday, June 29, 2015 1:26 PM
To: Code Administrators; LNPC Pooled Blocks; Rico, Theresa D (Teri)
Cc: PA_Part3@neustar.biz
Subject: 813-TAMPACEN-FL-854268 DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 29 June 2015

January 12, 2015
 ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 813-TAMPACEN-FL-854268

Date of Application: 06/29/2015 Effective Date: _____

Date of Receipt: 06/29/2015 Date of Response: 06/29/2015

Service Provider Name: VERIZON FLORIDA INC.

(iconectiv™ LERG™ Routing Guide) 0328

OCN: _____

Parent Company OCN: 2080

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

HYPKFLXADS0

Rate Center:

TAMPACEN

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™ Location Identification code of the switching entity/POI shown on the Part 1A form (LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)