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FPSC - COMMISSION CLERK

REDACTED

July 30, 2015

RECEIVED FPSC
15 JUL 30 PM 4:32
COMMISSION CLERK

Carlotta S. Stauffer, 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 Orlando exchange (Azalea
Park)**

Dear Ms. Stauffer:

Enclosed is an original and seven copies of TCG South 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

TWH/mhs
Enclosure

cc: Elise R. Banister

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL 1 _____
IDM _____
TEL 6 _____
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: July 30, 2015
For the Panama City rate center)

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 Panama City rate center. In support, TCG states:

PARTIES

1. TCG is a general partnership and is authorized to do business in 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. § 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 Panama City rate center consists of one (1) switching entity that utilizes numbering resources: ORLDFLMAGT0.
5. On July 23, 2015 TCG requested 1000 consecutive numbers from NeuStar for the Panama City rate center to satisfy the customer’s request.

6. At the time of the request, the Panama City rate center had a MTE of 3.59 months and utilization of 66.3%.

7. July 27, 2015, NeuStar denied TCG's request because TCG had not met the utilization 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 the specific number format 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. TCG 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 TCG interferes with TCG's ability to serve its customer in Florida.

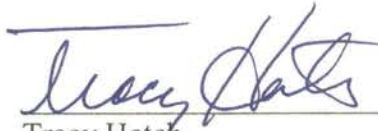
(b) As a result of NeuStar's denial of the request for additional numbering resources, TCG will be unable to provide telecommunications services to its customer as required under Florida law.

WHEREFORE, AT&T requests:

1. The Commission review the decision of NeuStar to deny TCG's request for additional numbering resources for the Panama City rate center; and

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

Respectfully submitted this 30th day of July, 2015

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

Tracy Hatch
c/o Elise Banister
150 South Monroe Street - Suite 400
Tallahassee, Florida 32301
(404) 927-5291

Attorney for TCG SOUTH FLORIDA

TBPAG Attachment 1 - January 12, 2015

Thousands-Block Application Form - Part 1A

Tracking Number: 850-PANAMACITY-FL-864193
Individual Block Request

Type of Application: New Change Disconnect

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name: [REDACTED]
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: 450 OCN: ^{iv} 8300 Parent Company's OCN 7125

Number of Thousands-Blocks Requested : 1

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

Rate Center: ^{vi} PANAMACITY

1.3 Dates:

Date of Application: ^{vii} 07/23/2015 Requested Block Effective Date: ^{viii} 08/23/2015

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? (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 _____ or 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 _____ or No _____
- d) Has this block been protected from further assignment: Yes _____ or 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

Title

07/23/2015
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 iconectiv™ 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 iconectiv Telecom 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^{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. The 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.

Footnotes:

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 PSTN 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} LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv

Appendix 3

January 12, 2015

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 850-PANAMACITY-FL-864193

Date: Thursday, July 23, 2015 OCN:8300 Company Name:TCG SOUTH FLORIDA

Rate Center: PANAMACITY

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)² [REDACTED]

Name of Block Applicant [REDACTED]

Signature [REDACTED]

Title [REDACTED]

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 calculation³ [REDACTED]

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

MTE Block

https://www.nationalpooling.com/pas/print_form.jsp

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 months⁴

[REDACTED]

F. Forecast - Next 12 months⁵

[REDACTED]

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6): 176.667

H. Months to Exhaust⁶ = $\frac{\text{Numbers Available for Assignment to Customers(A)}}{\text{Average Monthly Forecast(G)}}$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
1	[REDACTED]	3.589

I. Utilization⁷ = $\frac{\text{Assigned Numbers(B)}}{\text{Total Numbering Resources(C)-Excluded Numbers(D)}} \times 100 = \underline{66.35}$

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.

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

³Quantity 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).

⁴Net 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.

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

⁶To 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)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

LOPER, LISA A

From: dara.flowers@neustar.biz
Sent: Thursday, July 23, 2015 8:00 AM
To: [REDACTED]
Cc: PA_Part3@neustar.biz
Subject: 850-PANAMACITY-FL-864193 DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 23 July 2015

January 12, 2015
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 850-PANAMACITY-FL-864193
 Date of Application: 07/23/2015 Effective Date: _____
 Date of Receipt: 07/23/2015 Date of Response: 07/23/2015
 Service Provider Name: TCG SOUTH FLORIDA
 (iconectiv™ 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 PNCYFLMAXWY
 Rate Center: PANAMACITY

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™ Location Identification code of the switching

[REDACTED]

[REDACTED]

July 21, 2015

[REDACTED]

AT&T TNAC,

This Letter of Intent represents a request by [REDACTED] for a contiguous block of 1,000 new AT&T Telephone Numbers to be added to the IP Flexible Reach BVoIP Service. [REDACTED] intends to order service, in the PANAMA CITY FL rate center, on the PNCYFLMA switch pending AT&T's successful completion of the required testing. [REDACTED] intends to activate these numbers within 180 days from AT&T's receipt of the numbers.

[REDACTED] currently has an existing network configuration and therefore technical restrictions exist in the following blocks that are already in use.

[REDACTED]

[REDACTED] and the [REDACTED] remains a significant force in the North Florida and South Georgia communities we serve, with an economic impact exceeding [REDACTED]. Our more than [REDACTED] volunteers provide [REDACTED]

Sincerely,

[REDACTED]