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September 9, 2015 – **VIA OVERNIGHT DELIVERY**

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

**REDACTED**

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 East 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 \_\_\_\_\_

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15 SEP 10 AM 9:43  
COMMISSION  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No.  
Filed: September 10, 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 East 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 East rate center so the customer can obtain consecutive

numbers that would replace its current, fragmented, numbers. 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 September 3, 2015 to the Pooling Administrator, NeuStar, for a Ten Thousand Block in the Tampa East rate center. Verizon's application is attached as Exhibit 2.

6. NeuStar denied Verizon's request on September 3, 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 East rate center's months-to-exhaust calculation was longer than six months and its number utilization of 56.71% 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."<sup>1</sup> 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

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<sup>1</sup> *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."<sup>2</sup>

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.<sup>3</sup>

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."<sup>4</sup> 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

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<sup>2</sup> *Id.* ¶ 64.

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

<sup>4</sup> *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 East 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 East rate center.

Respectfully submitted on September 10, 2015.

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

Attorney for Verizon Florida LLC

**EXHIBIT 1**

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REDACTED

**Thousands-Block Application Form  
Part1A**

Type of Application (check one):

 New Change<sup>i</sup> DeleteGENERAL APPLICATION INFORMATION**1.1 Contact Information:**Block Applicant:Company Name: VERIZON FLORIDA INC.

Headquarters Address:

140 WEST STREET City NEW YORK State NY 10007 ZipContact Name: Theresa Rico

Contact Address:

900 Race St 9th Floor City Philadelphia State PA Zip 19107Phone: 215-440-4120 Fax: 215-625-8548E-Mail: theresa.d.rico@verizon.comPooling Administrator<sup>ii</sup>:Contact Name: Gary Zahn

Contact Address:

1800 Sutter St. Suite 570 City Concord State CA Zip 94520Phone: 925-363-8753 Fax: 925-363-7688E-Mail: gary.zahn@neustar.biz**1.2 General Information:**Check one: No LRN needed  LRN needed<sup>iii</sup> NPA: 813 Lata: 952 OCN<sup>iv</sup>: 0328 Parent Company's OCN NONENumber of Thousand Blocks Requested: 10Switch Identification (Switching Entity/POI)<sup>v</sup>: BRNDFLXA68H City or Wire Center Name: TAMPAESTRate Center<sup>vi</sup>: TAMPA EAST Rate Center Sub Zone:**1.3 Dates**Date of Application<sup>vii</sup>: 9/2/2015 Requested Block Effective Date<sup>viii</sup>: 11/2/2015Request Expedited Treatment? (See Section 8.6) Yes  No **1.4 Type of Service Provider Requesting the Thousands-Block:**a) Type of Service Provider: LEC (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)

## **Thousands-Block Application Form Part1A**

**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>x</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.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.



**Thousands-Block Application Form  
Part1A**

Foot Notes:

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

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA

<sup>iv</sup> 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).

<sup>v</sup> 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.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.

<sup>viii</sup> 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).

<sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET - TN Level<sup>1</sup>**  
**(Thousand-Block Number Pooling Growth Block Request)**

**CONFIDENTIAL**

Date: 9/2/2015 OCN: 0328 Company Name: VERIZON FLORIDA INC.

Rate Center: TAMPA EAST

List all codes NPA(s)-NXXs and Block NPA(s)-NXX-X(s): See attached list

Name of Block Applicant: Theresa Rico

Signature: Theresa Rico

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

Telephone No: 215-440-4120

FAX No: 215-625-8548

- A. Available Numbers:
- B. Assigned Numbers:
- C. Total Numbering Resources:
- D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation:  
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
----------	----------	----------	----------	----------	----------	----------	----------	----------	-----------	-----------	-----------

E. Growth History - Previous 6 month<sup>2</sup>

F. Forecast - Next 12 months<sup>3</sup>

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

H. Months to Exhaust<sup>4</sup>      Number Available for Assignment to Customers (A)      =      33

I. Utilization<sup>5</sup>      Average Montly Forecast (G)  
Assigned Numbers (B) – Excluded Numbers (D)      \* 100 =      56.71  
Total Numbering Resources

Explanation:

**CONFIDENTIAL**

REDACTED

**EXHIBIT 3**

<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 audit purposes, the applicant must retain a copy of this document.

<sup>2</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>3</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

<sup>4</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, § 52.15 (g) (3) (iii)).

<sup>5</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Appendix 3 Modified August 6,2001

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

813-571-7, 813-643-1,2,4,5,8, 813-651-1,4, 813-653-3, 813-654-3, 813-657-3,6, 813-661-2,5,6, 813-681-3,4, 813-684-6, 813-685-4,5, 813-689-3,7, 813-982-5, 813-571-8, 813-643-0, 813-653-4, 813-654-4, 813-657-0,2,4, 813-661-8, 813-662-0,3, 813-681-6, 813-684-0,1, 813-685-1,3, 813-689-1, 813-982-0, 813-986-0,3, 813-571-6,9, 813-651-2,9, 813-653-1, 813-654-2, 813-655-0,3, 813-657-1, 813-661-1,7, 813-662-5, 813-681-7,8, 813-689-4,5,6, 813-986-7,8,9, 813-571-3,5, 813-643-7, 813-651-6, 813-653-6,8, 813-654-1, 813-655-9, 813-661-3,4, 813-681-2,5, 813-685-2, 813-982-1,2, 813-986-4,5, 813-643-9, 813-654-0, 813-657-9, 813-661-0, 813-662-6,8, 813-681-1, 813-684-3,7, 813-685-7,8,9, 813-986-6, 813-571-1,2, 813-651-3,8, 813-653-5, 813-654-5,7,9, 813-655-2,5,8, 813-657-7, 813-661-9, 813-662-9, 813-685-0,6, 813-689-2, 813-986-1,2, 813-571-0, 813-651-7, 813-653-2,9, 813-654-6, 813-655-1,4,7, 813-657-8, 813-662-1,2, 813-681-9, 813-684-5,8,9, 813-689-8,9, 813-643-3,6, 813-651-0,5, 813-653-0,7, 813-654-8, 813-655-6, 813-657-5, 813-662-7, 813-681-0, 813-684-2,4, 813-689-0, 813-982-8,9

**From:** [dara.flowers@neustar.biz](mailto:dara.flowers@neustar.biz) [mailto:dara.flowers@neustar.biz]  
**Sent:** Thursday, September 03, 2015 4:08 PM  
**To:** Code Administrators; LNPC Pooled Blocks; Rico, Theresa D (Teri)  
**Cc:** [PA\\_Part3@neustar.biz](mailto:PA_Part3@neustar.biz)  
**Subject:** 813-TAMPAEST-FL-871838 DENIED PAS - Part 3 Confirmation

## Pooling Administration System

Dated 03 September 2015

January 12, 2015  
 ATIS-0300066.at3

Attachment 3

### Pooling Administrator's Response/Confirmation TBPAG Part 3

Tracking Number : 813-TAMPAEST-FL-871838

Date of Application: 09/03/2015 Effective Date: \_\_\_\_\_

Date of Receipt: 09/03/2015 Date of Response: 09/03/2015

Service Provider Name: VERIZON FLORIDA INC.

(iconectiv™ LERG™ Routing Guide ) OCN: 0328

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](mailto: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>

BRNDFLXA68H

Rate Center:

TAMPAEST

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:

<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

(LERG ROUTING Guide and CLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)

