

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of MCImetro Access	)	Docket No.
Transmission Services LLC d/b/a Verizon	)	Filed: November 25, 2015
Transmission Services LLC for Expedited	)	
Review of NeuStar's Denial of Application	)	
for Numbering Resources	)	
_____	)	

**PETITION OF MCIMETRO ACCESS TRANSMISSION SERVICES LLC  
D/B/A VERIZON TRANSMISSION SERVICES LLC FOR EXPEDITED REVIEW  
OF NEUSTAR'S DENIAL OF APPLICATION FOR NUMBERING RESOURCES**

MCImetro Access Transmission Services LLC d/b/a Verizon Transmission Services LLC (Verizon) requests that the Commission review Neustar's denial of Verizon's application for two Thousand Blocks of telephone numbers (Thousand Blocks) in the Sanford rate center, overturn that decision, and order that two Thousand Blocks 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 (DID) arrangement has requested that Verizon provide 1,500 consecutive DID telephone numbers in the 407 NPA in the Sanford rate center so the customer can meet its dial plan arrangements. A confidential copy of the customer's letter explaining the circumstances is attached as Confidential Exhibit 1.

5. Because Verizon does not have 1,500 consecutive telephone numbers in its inventory, it applied on November 18, 2015 to the Pooling Administrator, NeuStar, for two Thousand Blocks in the Sanford rate center. Verizon's application is attached as Exhibit 2.

6. NeuStar denied Verizon's request on November 18, 2015. The request was denied because Verizon did not meet both of the FCC criteria that NeuStar applies, even though Verizon does not have the numbering resources needed to satisfy its customer's request. Verizon's utilization exceeded the FCC's 75% threshold, but the months-to-exhaust calculation for both Thousand Blocks was longer than six months. 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 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.

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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).

<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).

10. Verizon's request for two Thousand Blocks 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 requests that the Commission direct NeuStar to assign two Thousand Blocks for the Sanford 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 two Thousand Blocks in the Sanford rate center.

Respectfully submitted on November 25, 2015.

By:   
\_\_\_\_\_  
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Attorney for MCImetro Access Transmission  
Services LLC d/b/a Verizon Transmission  
Services LLC

## TBPAG Attachment 1 - January 12, 2015

## Thousands-Block Application Form - Part 1A

Tracking Number: **407-SANFORD-  
FL-885364**  
**Individual Block  
Request**

Type of Application:  New                       Change <sup>1</sup>                       Disconnect

**GENERAL APPLICATION INFORMATION**

## 1.1 Contact Information:

**Block Applicant:**

Company Name: **MCI WORLDCOM COMMUNICATIONS, INC. - FL**

Headquarters Address: **22001 Loudoun County Parkway**

City, State, Zip: **Ashburn, VA, 20147**

Contact Name: **Godfrey Chisanga**

Contact Address: **2400 N Glenville Dr**

City, State, Zip: **Richardson, TX, 75082**

Phone: **972-729-5103** Fax: **972-729-5156** E-mail: **godfrey.chisanga@verizonbusiness.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: 407 LATA: 458 OCN: <sup>iv</sup> 7448 Parent Company's OCN 7229

Number of Thousands-Blocks Requested : 2

Switch Identification (Switching Entity/POI) : <sup>v</sup> ORLEFLIQDS0

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

1.3 Dates:

Date of Application: <sup>vii</sup> 11/18/2015 Requested Block Effective Date: <sup>viii</sup> 12/07/2015

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 \_\_\_\_\_

Expedited Explanation:

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) 407-915-1 and 2
- 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  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 \_\_\_\_\_ 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](mailto:inc@atis.org) as of the date of this application.

**Godfrey Chisanga**

**Snr Network Engineer**

**11/18/2015**

Signature of Block Applicant    Title

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<sup>TM</sup>

LERG<sup>TM</sup> 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<sup>TM</sup> 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.

Footnotes:

<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.

<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<sup>TM</sup> 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>ix</sup> Select if you are the current Block Holder.

<sup>x</sup> Select if you are not the current Block Holder

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

January 12, 2015  
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation  
TBPAG Part 3

Tracking Number : 407-SANFORD-  
FL-885364

Date of Application: 11/18/2015 Effective Date: \_\_\_\_\_

Date of Receipt: 11/18/2015 Date of Response: 11/18/2015

Service Provider Name: MCI WORLDCOM COMMUNICATIONS, INC. - FL

(iconectiv™ LERG™ Routing Guide ) OCN: 7448

Parent Company OCN: 7229

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 : \_\_\_\_\_

**ORLEFLIQDS0**

Switch Identification(Switch Entity/POI): <sup>1</sup>

Rate Center:

SANFORD

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:

<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 CLLI are trademarks of Telcordia Technologies, Inc. dba iconectiv)