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FPSC - COMMISSION CLERK

February 12, 2018

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 New Port Richey Rate Center**

REDACTED

Dear Ms. Stauffer:

Enclosed is an original and seven copies of Teleport Communications America, LLC-FL's ("TCAL'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 enclosed Certificate of Service.

Sincerely,

Tracy W. Hatch

TWH/mhs
Enclosures

cc: Elise R. Banister

1181449

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM** 7+1 redacted
- CLK _____

RECEIVED-FPSC
2018 FEB 12 PM 4: 37
COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for Expedited Review of Growth) Docket No.
Code Denial by the Number Pooling Administrator) Filed: February 12, 2018
For the New Port Richey Rate Center)

PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL

Teleport Communications America, LLC - FL (“TCAL”) 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 TCAL’s request for additional numbering resources in the New Port Richey rate center. In support of this petition, TCAL states:

PARTIES

1. TCAL 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 New Port Richey rate center has 1 switching entity, TAMPFLXAXJZ. There are 1250 working numbers and 750 available numbers across the 2 blocks: 727-481-1 and 727-484-3.

5. On January 22, 2018, TCAL requested 5000 consecutive numbers from NeuStar, for the Englewood rate center, to satisfy the customer's request.

6. At the time of the request, the Englewood rate center had a MTE of 5.63 months and utilization of ~62.5%.

7. January 22, 2018, NeuStar denied TCAL's request because TCAL had not met the utilization criteria, notwithstanding the fact that TCAL 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 Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.

10. TCAL 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 TCAL interferes with TCAL's ability to serve its customer in Florida.

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

WHEREFORE, TCAL requests:

1. The Commission review the decision of NeuStar to deny TCAL's request for additional numbering resources for the New Port Richey rate center; and

2. The Commission direct NeuStar to provide the requested numbering resources for the New Port Richey rate center as discussed above. There are not 5 blocks in the New Port Richey inventory pool. A new code will need to be opened.

Respectfully submitted this 12th day of February, 2018.

TELEPORT COMMUNICATIONS AMERICA, LLC



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1181450

Central Office Code Assignment Guidelines (COAG)
Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking Number: 727-NWPTRICHEY-FL-1065297

Full NXX: Pool Replenishment

Type of Application: New Change¹ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL

Headquarters Address: [REDACTED]

City, State, Zip: [REDACTED]

Contact Name: [REDACTED]

Contact Address: [REDACTED]

City: [REDACTED] State: [REDACTED] ZIP: [REDACTED]

Phone: [REDACTED] Fax : [REDACTED]

E-mail: [REDACTED]

Code Administrator:²

Name: Patricia Soderland

Address: 21575 Ridgetop Circle

City: Sterling State: VA ZIP: 20166

Phone: 571-434-5348 Fax : 571-434-5502

1.2 NPA: 727 NXX:³ LATA: 952 OCN:⁴8300
Parent Company's OCN(s) 7125

Switching Identification (Switching Entity/POI)

⁵TAMPFLXAXJZ

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

Homing Tandem Operating Co.⁷:ATT Tandem Homing
CLLI^{TM8}:TAMPFLXA03T

1.3 Dates

Date of Application: 01/22/2018

Requested Effective

Date: ^{9,10}

03/29/2018

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 X

Expedite Documentation must be provided if "Request Expedite" = Yes

Expedited Explanation:

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other): _____

CAP OR CLEC

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

c) Code Assignment Preference (Optional) _____

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 Reservations

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.

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/inc/incguides.asp>) as of the date of this application¹⁴.

[Redacted Signature]

Signature of Code Applicant

[Redacted Title]

Title

[Redacted Date]

Date

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 (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 iconectiv Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language® Location Code (CLLI™ Code) of the applicant's switch or POI. Common Language® and Telcordia® are registered trademarks and CLLI™, LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

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.

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 shall 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.

¹⁴An incomplete form may result in delays in processing this request.

Thousands-Block Number Pooling Administration Guidelines (TBPA) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 727-NWPTRICHEY-FL-1065297

Date: Monday, January 22, 2018 OCN: 8300 Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL

Rate Center: NWPTRICHEY

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: NPA NXX X Rate Center Name
OCN Quantity 727 484 1 NWPTRICHEY 8300 1000 727 484 3 NWPTRICHEY 8300 1000

Name of Block Applicant: [Redacted]

Signature: [Redacted]

[Redacted]

Phone: [Redacted]

Fax:

E-Mail: [Redacted]

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 ³ [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

E. Growth History - Previous 6 months⁴



F. Forecast - Next 12 months⁵



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

H. Months to Exhaust⁶
=

Numbers Available for Assignment to Customers (A)

Average Monthly Forecast (G)

Block Requested



Available Numbers



Months To Exhaust



I. Utilization⁷
=

Assigned Numbers (B)

X 100 =



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

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. (47 CFR § 52.15 (g) (4) (iii)).

⁷Newly acquired numbers may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii))

Thousands-Block Number Pooling Administration Guidelines
(TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 727-NWPTRICHEY-
FL-1065297

Date of Application: 01/22/2018 Effective Date: _____

Date of Receipt: 01/22/2018 Date of Response: 01/22/2018

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL

(LERGTM Routing
Guide¹) 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 (1-1000): _____

Switch Identification (Switching/POI)²: TAMPFLXAXJZ

Rate Center: NWPTRICHEY

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 Administrator.

Explanation:

Remarks:

¹ Telcordia® is a registered trademark and LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language® Location Code (CLLI™ Code) of the switching entity/POI shown on the Part 1A form. Common Language® is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.