

One Verizon Place
Alpharetta, GA 30004
(678) 339-5081
de.oroark@verizon.com

Dulaney L. O'Roark
Associate General Counsel

REDACTED

August 22, 2019

via Overnight Delivery

Adam Teitzman, Director
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard, Suite 152
Tallahassee, FL 32399-0850

RECEIVED-FPSC
2019 AUG 23 AM 9:31
COMMISSION
CLERK

Re: Docket No. XXXXXXXX - Petition of MCImetro Access Transmission Services LLC d/b/a Verizon Transmission Services LLC for Expedited Review of SOMOS' Denial of Application for Numbering Resources

Dear Mr. Teitzman:

MCImetro Access Transmission Services LLC d/b/a Verizon Transmission Services LLC (Verizon) submits for filing its Petition requesting that the Commission review SOMOS' denial of Verizon's application for a one Thousand Block of telephone numbers in Clearwater, Florida rate center.

Pursuant to Section 364.183(3), Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Verizon hereby makes a claim of confidentiality for information contained in Exhibits 1 and 3 attached to the 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 Clearwater, Florida rate center. One highlighted copy of the confidential information is enclosed in a sealed envelope. Two redacted copies of the information are also included.

Thank you for your attention to this matter.

Sincerely,

Dulaney L. O'Roark / kms
Dulaney L. O'Roark

Enclosures

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL _____
IDM 2
CLK _____



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of MCImetro Access) Docket No.
Transmission Services LLC d/b/a Verizon) Filed: August 22, 2019
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 SOMOS' DENIAL OF APPLICATION FOR NUMBERING RESOURCES**

MCImetro Access Transmission Services LLC d/b/a Verizon Transmission Services LLC (Verizon) requests that the Commission review SOMOS' denial of Verizon's application for a one Thousand Block of telephone numbers (Thousand Block) in the Clearwater, Florida rate center, overturn that decision, and order that a Thousand Block be assigned to Verizon. In support of this Petition, Verizon states:

PARTIES

1. Verizon is a competitive local exchange telecommunications company that provides local exchange service and exchange access service in Florida.

2. SOMOS 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 300 consecutive DID telephone numbers in the 727 NPA in the Clearwater FL 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 300 consecutive telephone numbers in its inventory, it applied on August 9, 2019 to the Pooling Administrator, SOMOS, for a Thousand Block in the Clearwater, Florida rate center. Verizon's application is attached as Exhibit 2.

6. SOMOS denied Verizon's request on August 9, 2019. The request was denied because Verizon did not meet the FCC criteria that SOMOS applies, even though Verizon does not have the numbering resources needed to satisfy its customer's request. Verizon's utilization did not meet the FCC's 75% threshold, or the six months-to-exhaust calculation. The Months-to-Exhaust and Utilization Worksheet is attached as Confidential Exhibit 3. SOMOS' denial of Verizon's application is attached as Exhibit 4.

7. The FCC has delegated authority to the Commission to address SOMOS' 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 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 SOMOS’ 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. SOMOS’ 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, SOMOS is preventing this customer from obtaining the service it wants from the carrier of its choice.

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).

² *Id.* ¶ 64.

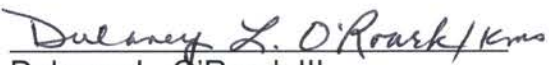
³ *Petition for Expedited Review of NXX-X Code Denial*, Docket No. 120041-TL, Order No. PSC-12-0089-PAA-TL (March 1, 2012).

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).

10. Verizon's request for a 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 requests that the Commission direct SOMOS to assign a Thousand Block for the Clearwater, Florida rate center so that Verizon can satisfy its customer's request.

WHEREFORE, Verizon respectfully requests that the Commission review SOMOS' decision to deny Verizon's request for additional numbering resources, overturn that decision, and direct SOMOS to assign Verizon a Thousand Block in the Clearwater, Florida rate center.

Respectfully submitted on August 22, 2019.

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

Attorney for MCImetro Access Transmission
Services LLC d/b/a Verizon Transmission
Services LLC

Exhibit 1

REDACTED

Tracking Number: **727-CLEARWATER-FL-1176868**

Thousands-Block Application Form - Part 1A
Revised: January 4, 2016

**Individual Block
Request**

Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: **MCI WORLDCOM COMMUNICATIONS, INC. - FL**
Headquarters Address: **One Verizon Way**
City: **Basking Ridge** State: **NJ** ZIP: **07920**
Contact Name: **Katherine Rafalski**
Contact Address: **900 Chelmsford Road**
City: **Lowell** State: **MA** ZIP: **01851**
Phone: **978-322-2153** Fax: **978-323-4849**
E-mail: **katherine.rafalski@one.verizon.com**

Pooling Administrator:ⁱⁱ

Contact Name: **Dara Flowers**
Contact Address: **1800 Sutter St**
City: **Concord** State: **CA** ZIP: **94520**
Phone: **925-420-0367** Fax: **925-420-0377**
E-mail: **dflowers@somos.com**

1.2 General Information:

Check one : No LRN needed _____ LRN neededⁱⁱⁱ: _____

NPA: 727 LATA: 952 OCN^{iv}: 7448 Parent Company's OCN 7229

Number of Thousands-Blocks Requested : 1

Switch Identification (Switching Entity/POI^v):

TAMQFLSZDS0

Rate Center^{vi}: CLEARWATER

1.3 Dates:

Date of Application^{vii}: 08/09/2019

Requested Effective Date^{viii}: 09/09/2019

Requested Expedited Treatment? (See Section 8.6) Yes _____ No X

I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this request applies to a reduction in the Administrator's processing time, and that processing will still be processed.

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) 727-477-4
- 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

I acknowledge that I am willing to pay for the block in red and explicitly understand that the underlying CO c will be activated in the PSTN and loaded in the NPAC on the block of service.

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 _____ 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 _____ No _____
- d) Has this block been protected from further assignment: Yes _____ 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 (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

<u>Katherine Rafalski</u>	<u>Code Administrator</u>	<u>08/09/2019</u>
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 Telcordia Technologies, Inc. dba iconectiv (iconectivTM) LERGTM Routing Guide^{xi}. The Operating Company Number (OCN) assigned to the service provider and the OCN of its parent company. An OCN is a four-character alphanumeric NECA-assigned Company Code or a four-character alphanumeric

identifier assigned by the iconectivTM Telecom Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification. 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 or VoIP. Also indicate the primary type of business in which the numbering resource is to be used. Service Providers 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 except when a service provider is exiting the market or is exchanging a block that was identified as being over 10% contaminated. 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:

ⁱIdentify the type of change(s) in Section 1.5.

ⁱⁱThe Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱA 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).

^vThis 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} 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.

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - 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-CLEARWATER-FL-1176868

Date: Friday, August 9, 2019 OCN: 7448 Company Name: MCI WORLDCOM COMMUNICATIONS, INC. - FL

Rate Center: CLEARWATER

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²: 727-254-4, 727-260-5, 727-431-0, 727-431-1, 727-431-3, 727-431-4, 727-431-5, 727-431-6, 727-431-7, 727-431-8, 727-437-0, 727-437-1, 727-437-3, 727-437-5, 727-559-2, 727-729-3, 727-729-4, 727-729-5, 727-729-6, 727-729-7, 727-729-8, 727-812,

Name of Block Applicant: Katherine Rafalski

Signature: Katherine Rafalski

Title: Code Administrator

Phone: 978-322-2153-

Fax: 978-323-4849

E-Mail: katherine.rafalski@one.verizon.com

A. Available Numbers:

B. Assigned Numbers:

C. Total Numbering Resources:

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ³:

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

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

F. Forecast
- Next 12
months⁵

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

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		190.368

I.
Utilization⁷
=
$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 = \underline{\underline{62.803}}$$

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.

²List all numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated list and shall provide an explanation of the adjustment in the Explanation field.

³The total quantity of numbers available for assignment from the numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the number of available resources due to pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁴The total quantity of numbering resources allocated to the OCN for the requested rate center, including newly acquired codes (NPA-NXXs) and blocks (NPA-NXX-Xs). This information is available from the Total Numbering Resources Report in PAS and shall automatically populate on this form in PAS. When an exception exists, the Applicant shall adjust the auto-populated number as needed and provide an explanation of the adjustment in the Explanation field (e.g., to increase the total number of resources to include pending applications in the same rate center, or for documentation purposes for safety valve waivers).

⁵Quantity of numbers activated in the past 90 days indicates newly acquired 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).

⁶Net 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.

⁷Forecast of TNs needed in each following month, starting with the most recent month as Month 1.

⁸This field is automatically calculated and populated on this form in PAS.

⁹This field is automatically calculated and populated on this form in PAS. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" shall be less than or equal to 6 months. (47 CFR § 52.15 (g) (4) (iii)).

¹⁰This field is automatically calculated and populated on this form in PAS. To be assigned an additional thousands-block (NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly 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-
CLEARWATER-FL-
1176868

Date of Application: 08/09/2019 Effective Date: _____

Date of Receipt: 08/09/2019 Date of Response: 08/09/2019

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

(LERGTM Routing Guide¹) OCN: 7448

Parent Company OCN: 7229

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Dara Flowers Phone: 925-420-0367

Signature of Pooling Administrator

Dara Flowers Fax: 925-420-0377

Name (print)

Email: dflowers@somos.com

 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: TAMQFLSZDS0
Rate Center: CLEARWATER

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 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.