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September 16, 2019

**via Electronic Delivery**

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

**Re: *Petition of MCImetro Access Transmission Services LLC d/b/a Verizon  
Transmission Services LLC for Expedited Review of Winterpark's 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 Winterpark's denial of Verizon's application for a one Thousand Block of telephone numbers in Winterpark, Florida rate center.

Verizon inadvertently omitted the attached Petition from its previous filing of redacted and confidential material.

Thank you for your attention to this matter.

Sincerely,

  
Dulaney L. O'Roark

Attachment

**verizon**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of MCImetro Access ) Docket No.  
Transmission Services LLC d/b/a Verizon ) Filed: September 16, 2019  
Transmission Services LLC for Expedited )  
Review of Winterpark’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 WINTERPARK’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 Winterpark’s denial of Verizon’s application for a one Thousand Block of telephone numbers (Thousand Block) in the Winterpark, 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 local exchange telecommunications company that provides local exchange service and exchange access service in Florida.
2. Winterpark 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 Verizon Business Voice over Internet Protocol IP trunking platform has requested that Verizon provide 400 consecutive DID telephone numbers in the 407 NPA in the Winterpark, Florida rate center. A confidential copy of the customer's letter explaining the circumstances is attached as Confidential Exhibit 1.

5. Because Verizon does not have 400 consecutive telephone numbers that meet the customer's needs, it applied on August 19, 2019 to the Pooling Administrator, Winterpark, for a Thousand Block in the Winterpark, Florida rate center. Verizon's application is attached as Exhibit 2.

6. Winterpark denied Verizon's request on August 19, 2019. The request was denied because Verizon did not meet the FCC criteria that Winterpark applies, even though Verizon does not have the numbering resources needed to satisfy its customer's request. Verizon's utilization met the FCC's 75% threshold, but not the six months-to-exhaust threshold. The Months-to-Exhaust and Utilization Worksheet is attached as Confidential Exhibit 3. Winterpark's denial of Verizon's application is attached as Exhibit 4.

7. The FCC has delegated authority to the Commission to address Winterpark'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 Winterpark 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. Winterpark’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, Winterpark 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 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 Winterpark to assign a Thousand Block for the Winterpark, Florida rate center so that Verizon can satisfy its customer's request.

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

Respectfully submitted on September 16, 2019.

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