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FILED 5/14/2021  
DOCUMENT NO. 04084-2021  
FPSC - COMMISSION CLERK

May 14, 2021

Adam Teitzman, Commission Clerk  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**REDACTED**

Re: Docket No.: 20210100  
**Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator for the Hollywood Rate Center**

Dear Mr. Teitzman:

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 Hatch

TWH/ns  
Attachments

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
- GCL 1
- IDM 6
- CLK \_\_\_\_\_

RECEIVED-PPSC  
MAY 14 PM 4:34  
COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Re: Petition for Expedited Review of Growth ) Docket No.  
Code Denial by the Number Pooling Administrator )  
For the Hollywood rate center ) Filed: May 14, 2021

**PETITION FOR EXPEDITED REVIEW OF NXX-X CODE DENIAL**

BellSouth Telecommunications, LLC d/b/a AT&T Florida (“AT&T Florida”) 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 (“Somos”) denial of AT&T Florida’s request for additional numbering resources in the Hollywood rate center. In support of this petition, AT&T Florida states:

**PARTIES**

1. AT&T Florida is a corporation organized and formed under the laws of the State of Georgia and an incumbent local exchange company (“ILEC”) regulated by the Commission and authorized to provide local exchange telecommunications and toll telecommunications services in the State of Florida.
2. Somos 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 Section 364.16(7), Florida Statutes, Order FCC 00-104, and Industry Numbering Committee’s (INC) Number Pooling Guidelines, Sections 3.7 and 12(c). The INC provisions provide that a carrier may seek review of Somos’ decision to deny numbering resources before the appropriate regulatory authority.

**BACKGROUND AND REQUEST FOR RELIEF**

4. The Hollywood rate center is served by the **HLWDFLWHDSO** switch.

5. On April 23, 2021 AT&T Florida requested 1000 consecutive numbers from Somos, for the Hollywood rate center, to satisfy a customer's request.
6. At the time of the request, the Hollywood rate center had a month-to-exhaust (MTE) of 71610.333 months and utilization of 27.06%.
7. April 23, 2021, Somos denied AT&T Florida's request because AT&T Florida had not met the utilization threshold, notwithstanding the fact that AT&T Florida 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. The FCC's Order 00-104 and the INC guidelines provide that state regulatory authorities have the power and authority to review Somos' 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 North American Numbering Plan Administration ("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 the State of Florida; and (2) decisions that do not necessarily promote the efficient use of telephone numbers.
10. AT&T Florida requests that the Commission's reverse Somos' decision to withhold numbering resources on the following grounds:
  - (a) Somos' denial of numbering resources to AT&T Florida interferes with AT&T Florida's ability to serve its customer in Florida.
  - (b) The MTE at the rate center level requirement is discriminatory against the incumbent LEC because it deploys multiple switches in a rate center in order to meet customer demand for telephone service. The FCC rules for obtaining numbering resources both penalizes and discriminates against the ILECs for deploying multiple switches.

(b) As a result of Somos' denial of the request for additional numbering resources, AT&T Florida is unable to provide telecommunications services to its customer as required under Florida law.

WHEREFORE, AT&T Florida requests:

1. The Commission review the decision of Somos to deny AT&T Florida's request for additional numbering resources for the Hollywood rate center; and
2. The Commission direct Somos (Pooling Administrator) to provide the requested numbering resources for the Hollywood rate center as discussed above.

Respectfully submitted May 14, 2021.

BellSouth Telecommunications, LLC d/b/a AT&T Florida



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Suite 400  
Tallahassee, Florida 32301  
(850) 577-5505  
Email: [th9467@att.com](mailto:th9467@att.com)

**ARMESTO, AIDA D**

**From:** dflowers@somos.com  
**Sent:** Friday, April 23, 2021 12:15 PM  
**To:** ARMESTO, AIDA D; ARMESTO, AIDA D  
**Cc:** PA\_Part3@somos.com  
**Subject:** , 754-HOLLYWOOD-FL-1421038 DENIED PAS - Part 3A Confirmation

**Pooling Administration System**

Dated 23 April 2021

## Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 754-HOLLYWOOD-FL-1421038

Date of Application: 04/23/2021 Effective Date: \_\_\_\_\_  
Date of Receipt: 04/23/2021 Date of Response: 04/23/2021

Service Provider Name: BELLSOUTH TELECOMM, INC DBA SOUTHERN BELL TEL & TEL  
(LERG™ Routing Guide<sup>1</sup>)  
OCN: 9417  
Parent Company OCN: 9400

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)<sup>2</sup>: HLWDFLWHDS0

Rate Center: HOLLYWOOD

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 3A denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block (NPA-NXX-X) & Central Office Code (NPA-NXX) Administration Guidelines for the appeals process.**

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

<sup>1</sup> iconectiv®, Telcordia®, and Common Language® are registered trademarks and CLCI™, CLLI™, LERG™ Routing Guide and TPM™ Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.

**ARMESTO, AIDA D**

---

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Dara Flowers Phone: 925-420-0367  
Signature of Pooling Administrator  
Dara Flowers Fax: 925-420-0377  
Name (print)  
Email: dflowers@somos.com

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Block Reservation Expiration Date : \_\_\_\_\_

Block/Code Modified : \_\_\_\_\_

Block/Code \_\_\_\_\_

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<sup>2</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the Common Language Location Code (CLLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.



Central Office Code (NPA-NXX) Application - Part 1  
Revised: October 31, 2019

Tracking Number: **754-HOLLYWOOD-FL-1421038**

**Full NXX: Pool Replenishment**

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

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: [REDACTED]

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:<sup>2</sup>

Name: **Patricia Soderland**

Address: **2411 Dulles Corner Park Suite 250**

City: **Herndon** State: **VA** ZIP: **20171**

Phone: **571-363-3828** Fax: **571-363-3838**

NXX:<sup>3</sup> LATA: **460**

1.2 NPA: **754** OCN:<sup>4</sup>**9417** Parent Company's OCN(s) **9400**

Switching Identification (Switching Entity/POI)

<sup>5</sup>**HLWDFLWHDS0**

Locality/City/Wire Center: Rate Center:<sup>6</sup>**HOLLYWOOD**

Homing Tandem Operating Co.<sup>7</sup>: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

Tandem Homing  
CLLI<sup>TM8</sup>: NDADFLGG01T

1.3 Dates

Date of Application: 04/23/2021

Requested Effective  
Date:<sup>9,10</sup>  
06/28/2021

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

Expedite Documentation must be provided if "Request Expedite" = Yes  
Expedited Explanation:

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other): Incumbent Local Exchange Carrier (ILEC)

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

c) Code Assignment Preference (Optional) [REDACTED]

d) Codes that are undesirable, if any \_\_\_\_\_

e) Type of Change (Mark all that apply)

OCN-Intra-company<sup>11</sup>  Switching Id  Rate Center   
Tandem Homing CLLI

OCN-Inter-company<sup>12</sup>  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: <sup>13</sup>  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 a CO Code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block and Central Office Code Administration Guidelines (TBCOCAG) posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application.<sup>14</sup>

\_\_\_\_\_  
Signature of Code Applicant

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

<sup>1</sup>Identify type and reason for change(s) in Section 1.4(e).

<sup>2</sup>A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from the North American Numbering Plan Administrator (NANPA).

<sup>3</sup>The NXX field is required for any Central Office (CO) Code (NPA-NXX) request in which there is a change or the CO Code is being returned.

<sup>4</sup>Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to Central Office (CO) Code (NPA-NXX) 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 Telecom Routing Administration (TRA) on 732-699-6700.

<sup>5</sup>This is an eleven-character descriptor of the Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the eleven-character iconectiv<sup>®</sup> Common Language Location

Identification (CLLI<sup>TM</sup>) Code of the applicant's Switching Entity/POI. (iconectiv<sup>®</sup>, Telcordia<sup>®</sup>, and Common Language<sup>®</sup> are registered trademarks and CLCI<sup>TM</sup>, CLLI<sup>TM</sup>, LERG<sup>TM</sup> Routing Guide and TPM<sup>TM</sup> Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.)

<sup>6</sup>Rate Center name shall be a tariffed Rate Center associated with toll billing.

<sup>7</sup>Applies to any Central Office (CO) Code Applicant connecting to the Public Switched Telephone Network via a tandem owned by a different Service Provider (SP).

<sup>8</sup>This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This shall be the CLLI Code of the Switching entity/Point of Interconnection (POI), and is the same on Part 2, Form 1, Page 2 of 2.

<sup>9</sup>Central Office (CO) Code 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 CO Code. Such arrangements are outside the scope of these guidelines.

<sup>10</sup>Requests for Central Office (CO) Code assignment shall not be made more than six months prior to the requested Effective Date.

<sup>11</sup>Select if you are the current Central Office (CO) Code Holder.

<sup>12</sup>Select if you are not the current Central Office (CO) Code Holder.

<sup>13</sup>The Applicant shall indicate "Yes" if the Central Office (CO) Code being requested shall be used for Thousands-Block Number Pooling and shall leave this field blank if it is not.

<sup>14</sup>An incomplete form may result in delays in processing this request.

Thousands-Block Months to Exhaust Certification Worksheet - TN Level<sup>1</sup> - Appendix 2

Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 754-HOLLYWOOD-FL-1421038

Date: Friday, April 23, 2021 OCN: 9417

Company Name: BELLSOUTH TELECOMM, INC DBA SOUTHERN BELL TEL & TEL

Rate Center: HOLLYWOOD

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: 754-703-2, 754-703-3, 954-265-0, 954-265-1, 954-265-2, 954-265-3, 954-265-4, 954-265-5, 954-265-6, 954-265-7, 954-265-8, 954-265-9, 954-276-0, 954-276-1, 954-276-2, 954-276-3, 954-276-4, 954-276-5, 954-276-6, 954-276-7, 954-276-8, 954-276-9, 954-310-9, 954-342-4, 954-342-8, 954-364-2, 954-364-4, 954-364-5, 954-433-0, 954-433-1, 954-433-2, 954-433-3, 954-433-4, 954-433-5, 954-433-7, 954-433-8, 954-433-9, 954-516-5, 954-518-0, 954-518-1, 954-518-2, 954-518-5, 954-518-6, 954-518-7, 954-518-8, 954-518-9, 954-602-1, 954-602-2, 954-602-3, 954-602-4, 954-602-5, 954-672-0, 954-672-1, 954-672-2, 954-672-3, 954-672-4, 954-672-5, 954-672-6, 954-672-7, 954-672-8, 954-672-9, 954-704-0, 954-704-1, 954-704-2, 954-704-3, 954-704-4, 954-704-5, 954-704-7, 954-704-8, 954-704-9, 954-844-0, 954-844-1, 954-844-2, 954-844-3, 954-844-4, 954-844-5, 954-844-6, 954-844-7, 954-844-8, 954-844-9, 954-883-0, 954-883-1, 954-883-2, 954-883-3, 954-883-4, 954-883-5, 954-883-6, 954-883-7, 954-883-8, 954-893-0, 954-893-1, 954-893-4, 954-893-5, 954-893-6, 954-893-7, 954-893-8, 954-893-9, 954-322, 954-392, 954-430, 954-431, 954-432, 954-435, 954-436, 954-437, 954-438, 954-441, 954-442, 954-443, 954-447, 954-450, 954-454, 954-455, 954-456, 954-457, 954-458, 954-499, 954-538, 954-885, 954-894, 954-920, 954-921, 954-922, 954-923, 954-924, 954-925, 954-926, 954-927, 954-929, 954-961, 954-962, 954-963, 954-964, 954-965, 954-966, 954-967, 954-981, 954-983, 954-985, 954-986, 954-987, 954-989,

Name of Block Applicant: [Redacted]

Signature: [Redacted]

Title: [Redacted]

Phone: [Redacted]

Fax: [Redacted]

E-Mail: [Redacted]

A. Available Numbers<sup>3</sup>: [Redacted]

B. Assigned Numbers: [Redacted]

C. Total Numbering Resources<sup>4</sup>: [REDACTED]

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation<sup>5</sup>: [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 months<sup>6</sup>

[REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]

F. Forecast - Next 12 months<sup>7</sup>

[REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]   [REDACTED]

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6)<sup>8</sup>: [REDACTED]

H. Months to Exhaust<sup>9</sup> = 
$$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$$

<u>Block Requested</u>	<u>Available Numbers</u>	<u>Months To Exhaust</u>
[REDACTED]	[REDACTED]	[REDACTED]

I. Utilization<sup>10</sup> = 
$$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 =$$
 [REDACTED]

Explanation: \_\_\_\_\_

<sup>1</sup>A copy of this worksheet is required to be submitted to the Pooling Administrator (PA) when requesting additional Numbering Resources in a rate center. For auditing purposes, the applicant shall retain a copy of this document.

<sup>2</sup>List all Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired Central Office (CO) Codes (NPA-NXX) and Thousands-Blocks (NPA-NXX-X). This information is available from the Total Numbering Resources 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.

<sup>3</sup>The total quantity of numbers available for assignment from the Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-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).

<sup>4</sup>The total quantity of Numbering Resources allocated to the OCN for the requested Rate Center, including newly acquired CO Codes (NPA-NXXs) and Thousands-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).

<sup>5</sup>Quantity of numbers activated in the past 90 days indicates newly acquired Thousands-Blocks (NPA-NXX-X) and/or Central Office (CO) Codes (NPA-NXX) 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).

<sup>6</sup>Net change in Telephone Numbers (TN) 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>7</sup>Forecast of Telephone Numbers (TN) needed in each following month, starting with the most recent month as Month 1.

<sup>8</sup>This field is automatically calculated and populated on this form in PAS.

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

<sup>10</sup>This field is automatically calculated and populated on this form in PAS. To be assigned an additional Thousands-Block (NPA-NXX-X) for growth, "Utilization" shall be 75% or more (47 CFR § 52.15 (h)). Newly acquired Numbering Resources may be excluded from the Utilization calculation (47 CFR § 52.15 (g)(4)(ii)).