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DOCKET NO. 20220108-TL

FILED 6/8/2022
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FPSC - COMMISSION CLERK

June 8, 2022

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.: 20220108
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 BellSouth Telecommunications LLC d/b/a AT&T Florida'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 attached Certificate of Service.

Sincerely,

Tracy Hatch

TWH/mw
Attachments

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL 1
IDM 6
CLK _____

RECEIVED-FPSC
2022 JUN -8 PM 4:54
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: June 8, 2022
For the Hollywood Rate Center)

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 intraLATA toll telecommunications 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 May 10, 2022, AT&T Florida requested 10000 consecutive numbers from Somos for the Hollywood rate center to satisfy the customer's request. See Attachment 1.
6. At the time of the request, the Hollywood rate center had a month-to-exhaust ("MTE") of 4671.638 months and utilization of 26.789%. As required by Order No. PSC-01-1973-PCO-TL, the MTE and utilization rate for the Hollywood exchange is attached. See Attachment 2. The customer's contact information is attached. See Attachment 3.
7. May 10, 2022, Somas 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.
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.

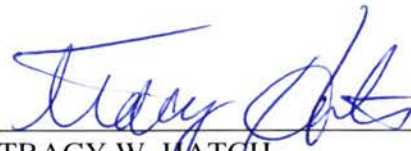
(c) As a result of Somos' denial of the request for additional numbering resources, AT&T Florida is unable to provide telecommunications services to its customer as required under Florida law.

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 June 8, 2022.

BELLSOUTH TELECOMMUNICATIONS, LLC d/b/a AT&T FLORIDA



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Attachment 1

Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 954-
HOLLYWOOD-FL-
1678706

Date of Application: 05/10/2022 Effective Date: _____

Date of Receipt: 05/10/2022 Date of Response: 05/10/2022

Service Provider Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL
TEL & TEL

(LERGTM Routing Guide¹) OCN: 9417

Parent Company OCN: 9400

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Jeffrey Galeano Phone: 866-623-2282

Signature of Pooling Administrator

Jeffrey Galeano Fax: 925-420-0377

Name (print)

Email: jgaleano@nanpa.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: HLWDFLWHDS0

Rate Center: HOLLYWOOD

X 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:

¹ 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.

² 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.

Tracking Number: **954-HOLLYWOOD-FL-1678706**

Thousands-Block (NPA-NXX-X) Application - Part 1A
Revised: October 31, 2019

Full NXX:
Dedicated
Customer

Type of Application: New Change ⁱ Disconnect

General Application Information

1.1 Contact Information:

Block Applicant:

Company Name: [REDACTED]
Headquarters Address: [REDACTED]
City: [REDACTED] State: [REDACTED] ZIP: [REDACTED]
Contact Name: [REDACTED]
Contact Address: [REDACTED]
City: [REDACTED] State: [REDACTED] ZIP: [REDACTED]
Phone: [REDACTED] Fax: [REDACTED]
E-mail: [REDACTED]

Pooling Administrator:ⁱⁱ

Contact Name: **Jeffrey Galeano**
Contact Address: **Two Tower Center Boulevard, 20th Floor**
City: **East Brunswick** State: **NJ** ZIP: **08816**
Phone: **866-623-2282** Fax: **925-420-0377**
E-mail: **igaleano@nanpa.com**

1.2 General Information:

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 a Thousands-Block (NPA-NXX-X) 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) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

 Signature of Block Applicant	 Title	 Date
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Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers (SP) 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 (PA) section also requires the SP to fill in the PA's name, address, phone, fax and e-mail.

Section 1.2 Service Providers (SP) who need a Thousands-Block (NPA-NXX-X) assignment or for a Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a Part 1 Central Office Code (NPA-NXX) Application needs to also be submitted to the Pooling Administrator (PA). The SP 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 (iconectiv[®]) LERG[™] Routing Guide^{xi}. The

Operating Company Number (OCN) assigned to the SP 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 iconectiv Telecom Routing Administration (TRA). In addition, the number of Thousands-Blocks requested should be supplied. The Switch Identification (Switching Entity/POI). Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider (SP) 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 (SP) 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. SPs 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 (SP) indicate the type of request. Initial requests are for first applications for Thousands-Blocks in a Rate Center, Growth applications are 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 (SP) shall indicate the updated/current information in regards to contaminated Telephone Numbers (TN) on the Thousands-Block they are returning to the Industry Inventory Pool. Thousands-Blocks with over 10% contamination (101 TNs or more) shall not be returned to the Industry Inventory Pool except when a SP is exiting the market or is exchanging a Thousands-Block that was identified as being over 10% contaminated. If the Thousands-Block being returned is over 10% contaminated, the Pooling Administrator (PA) shall seek a new Thousands-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 (PA) is available to assist in completing these forms.

ⁱⁱⁱA Part 1 Central Office (CO)Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

^{iv}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 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 Switching Entity/Point Of Interconnection (POI) provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM Code of the Switching Entity/POI.

^{vi}Rate Center name shall be a tariffed Rate Center.

^{vii}Acknowledgment and indication of disposition of this application shall 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 Central Office (CO) Code (NPA-NXX) of the LRN to be associated with this Thousands-Block(s) is/will be active in the PSTN prior to the effective date of the Thousands-Block(s).

^{ix}Select if you are the current Thousands-Block Holder.

^xSelect if you are not the current Thousands-Block Holder.

^{xi}iconectiv[®], Telcordia[®], and Common Language[®] are registered trademarks and CLCITM, CLLITM, LERGTM Routing Guide and TPMTM Data Source are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba as iconectiv.

Attachment 2

Thousands-Block Months to Exhaust Certification Worksheet - TN Level¹ - Appendix 2

Revised: October 31, 2019

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: 954-HOLLYWOOD-FL-1678706

Date: Tuesday, May 10, 2022 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)²:754-364-3, 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 Numbers³: [Redacted]

B. Assigned Numbers: [Redacted]

C. Total Numbering Resources⁴ [REDACTED]

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation⁵ [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 months⁶ [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

F. Forecast - Next 12 months⁷ [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)⁸ [REDACTED]

H. Months to Exhaust⁹ = $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$

Block Requested [REDACTED] Available Numbers [REDACTED] Months To Exhaust [REDACTED]

I. Utilization¹⁰ = $\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C)-Excluded Numbers (D)}} \times 100 =$ [REDACTED]

Explanation: _____

¹A 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.

²List 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.

³The 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).

⁴The 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).

⁵Quantity 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).

⁶Net 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.

⁷Forecast of Telephone Numbers (TN) 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 (NPA-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 (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)).