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DOCKET NO. 20230052-TA

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 FPSC - COMMISSION CLERK

April 13, 2023

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.:** 20230052  
**Petition for Expedited Review of Growth Code Denial by the Number Pooling Administrator for the Clermont 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 attached Certificate of Service.

Sincerely,

Tracy Hatch

TWH/mw  
 Attachments

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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Re: Petition for Expedited Review of Growth                    )     Docket No.  
Code Denial by the Number Pooling Administrator         )     Filed: April 13, 2023  
For the Coral Springs rate center                             )

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

Telecommunications of 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 (“NANPA”) denial of TCAL’s request for additional numbering resources in the Clermont 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. NANPA 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 NANPA’s decision to deny numbering resources to the appropriate regulatory authority.

**BACKGROUND AND REQUEST FOR RELIEF**

4. The Clermont rate center is served by only 1 switch (OCALFLXAX4Z). TCAL owns 1 block: 352-227-5 and 558 available numbers respectively.

5. On March 21, 2023, TCAL requested 3000 consecutive numbers in NPA 352 that do not begin with a 0 or 9. See Attachment 1.
6. At the time of the request, the Clermont rate center month-to-exhaust is 5.0 months and utilization is 44.2%. As required by Order No. PSC-01-1973-PCO-TL, the MTE and utilization rate for the Clermont exchange is attached. See Attachment 2. Pursuant to Commission Order No PSC-01-1973-PCO-TL the customer contact information is attached. See Attachment 3.
7. On March 21, 2023. NANPA denied TCAL's request because TCAL had not met the utilization threshold, notwithstanding the fact that TCAL is unable to provide the numbering resources requested by the specific customer. See Attachment 1.
8. As discussed above, both the FCC Order and the INC guidelines provide that state regulatory authorities have the power and authority to review NANPA'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 NANPA's decision to withhold numbering resources on the following grounds:
  - (a) NANPA's denial of numbering resources to TCAL interferes with TCAL's ability to serve its customer in Florida.
  - (b) As a result of NANPA'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 NANPA to deny TCAL's request for additional numbering resources for the Clermont rate center; and

2. The Commission direct NANPA to provide the requested numbering resources for the Clermont rate center as discussed above.

Respectfully submitted April 13, 2023.

Teleport Communications America LLC



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Pooling Administrator's Response/Confirmation - Part 3A

Revised: October 31, 2019

Tracking Number : 352-CLERMONT-FL-1801780

Date of Application: 03/21/2023 Effective Date: \_\_\_\_\_  
 Date of Receipt: 03/21/2023 Date of Response: 03/21/2023

Service Provider Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL  
 (LERG<sup>TM</sup> Routing Guide<sup>1</sup>) OCN: 8300  
 Parent Company OCN: 7125

NPAC SOA SPID : \_\_\_\_\_

Pooling Administrator Contact Information:

Agnes Rom Phone: 925-420-0129  
 Signature of Pooling Administrator  
Agnes Rom Fax: 925-420-0377  
 Name (print)  
 Email: arom@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)<sup>2</sup>: OCALFLXAX4Z  
 Rate Center: CLERMONT

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.**

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Request Withdrawn.

Explanation:

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Assignment Activity Suspended by Administrator.

Explanation:

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Remarks:

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<sup>1</sup> iconectiv<sup>®</sup>, Telcordia<sup>®</sup>, and Common Language<sup>®</sup> are registered trademarks and CLCI<sup>™</sup>, CLI<sup>™</sup>, LERG<sup>™</sup> Routing Guide and TPM<sup>™</sup> 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 (CLI Code) of the Switching Entity/Point Of Interconnection (POI) shown on the Part 1A.

Tracking Number: **352-CLERMONT-FL-1801780**

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

**Full NXX: Pool  
Replenishment**

Type of Application:  New  Change <sup>i</sup>  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:<sup>ii</sup>

Contact Name: **Agnes Rom**  
Contact Address: **Two Tower Center Boulevard, 20th Floor**  
City: **East Brunswick** State: **NJ** ZIP: **08816**  
Phone: **925-420-0129** Fax: **925-420-0377**  
E-mail: **arom@nanpa.com**

1.2 General Information:

Check one : No LRN needed  LRN needed<sup>iii</sup>:

NPA: **352** LATA: **454** OCN<sup>iv</sup>: [Redacted] - [Redacted] - [Redacted] Parent Company's OCN  
Number of Thousands-Blocks Requested : **1**

Switch Identification (Switching Entity/POI<sup>v</sup>): OCALFLXAX4Z

Rate Center<sup>vi</sup>: CLERMONT

1.3 Dates:

Date of Application<sup>vii</sup>: 03/21/2023

Requested Effective Date<sup>viii</sup>: 05/26/2023

Requested Expedited Treatment? (See Section 8.6) Yes  No

Expedited Explanation: We are serving as our own AOCN and will waive the entire 7 calendar day interval to update BIRDS.

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.

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider :                      (LEC, IXC, CMRS, Other)
- b) Primary Type of Service Blocks to be used for :
- c) Thousands-Block(s) (NXX-X) assignment preference (Optional)                     352-xxx-6, 352-xxx-7, 352-xxx-8
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any                     NPA-0XX,9XX-XXXX Cannot have 0 or 9 in first digit of the prefix...xxx-AXX-XXXX
- 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)                     N/A

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  If Yes, attach months to exhaust worksheet

By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change (Mark all that apply)

OCN: Intra-company<sup>ix</sup>    Switching Id    Part 1B

OCN: Inter-company<sup>x</sup>    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.

[Redacted Signature]	[Redacted Title]	[Redacted Date]
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 (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<sup>xi</sup>. 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:

<sup>i</sup>Identify the type of change(s) in Section 1.5.

<sup>ii</sup>The Pool Administrator (PA) is available to assist in completing these forms.

<sup>iii</sup>A Part 1 Central Office (CO) Code (NPA-NXX) Application shall also need to be submitted to the Pooling Administrator (PA).

<sup>iv</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 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).

<sup>v</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 11 character CLLI<sup>TM</sup> Code of the Switching Entity/POI.

<sup>vi</sup>Rate Center name shall be a tariffed Rate Center.

<sup>vii</sup>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.

<sup>viii</sup>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).

<sup>ix</sup>Select if you are the current Thousands-Block Holder.

<sup>x</sup>Select if you are not the current Thousands-Block Holder.

<sup>xi</sup>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.

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: 352-CLERMONT-FL-1801780

Date: Tuesday, March 21, 2023 OCN: 8300 Company Name: TELEPORT COMMUNICATIONS AMERICA, LLC - FL

Rate Center: CLERMONT

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)<sup>2</sup>: 352-227-5,

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	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 months <sup>6</sup>	1	2	3	4	5	6
	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]


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



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

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>
		

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

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)).